

EXHIBIT A

In The Matter Of:
Scott Weaver vs
Champion Pet Foods USA, et al.

Videotaped Deposition of Scott Weaver
June 19, 2019

Verbatim Reporting, Limited

2 East Mifflin Street, Suite 102

Madison, Wisconsin 53703

www.Verbatim-Madison.com

Office@Verbatim-Madison.com

608.255.7700



"Excellence in Reporting Since 1988"

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

SCOTT WEAVER,
Plaintiff,

-vs- Case No. 2:18-cv-1996-IPS

CHAMPION PETFOODS USA, INC.,
and CHAMPION PETFOODS, LP,
Defendants.

Videotaped Deposition of:
SCOTT WEAVER

Madison, Wisconsin
June 19, 2019

Reporter: Jessica Bolanos

VIDEOTAPED DEPOSITION OF

SCOTT WEAVER, called as a witness, taken at the instance of the Defendants, under the provisions of the Federal Rules of Civil Procedure, pursuant to notice, before Jessica Bolanos, a notary public in and for the State of Wisconsin, at the offices of Verbatim Reporting, Limited, Two East Mifflin Street, Suite 102, City of Madison, County of Dane, and State of Wisconsin, on the 19th day of June, 2019, commencing at 8:00 a.m.

A P P E A R A N C E S

REBECCA A. PETERSON, Attorney
LOCKRIDGE GRINDAL NAUEN, PLLP
100 Washington Avenue South, Suite 2200,
Minneapolis, Minnesota 55401, appearing on behalf of the Plaintiff.
rpeterson@locklaw.com 612-339-6900

ELISA H. BACA, Attorney
DAVID A. COULSON, Attorney
GREENBURG TRAURIG
333 Southeast 2nd Avenue, Suite 4400, Miami,
Florida 33131, appearing on behalf of the Defendants.
bacae@gtlaw.com 305-579-0549
coulson@gtlaw.com

Also Present: Jon Hansen, CLVS, videographer

I N D E X

1	WITNESS	Page(s)
3	SCOTT WEAVER	
4	Examination by Ms. Baca	5
5	Examination by Ms. Peterson	123
6	Examination by Ms. Baca	132
7	Examination by Ms. Peterson	133

E X H I B I T S

No.	Description	Identified
Exh. 1	Notice of deposition	6
Exh. 2	Plaintiff's response to interrogatories	44
Exh. 3	Second amended complaint	65
Exh. 4	Orijen Regional Red bag printout	72
Exh. 5	Orijen Six Fish bag printout	75
Exh. 6	Orijen Six Fish bag printout	79
Exh. 7	Purina Pro Plan Focus bag printout	100
Exh. 8	Orijen Regional Red bag printout	119

(Original exhibits attached to original transcript; copies provided to Attorney Baca and Attorney Peterson.)

(Original transcript filed with Attorney Baca; copies provided to Attorney Baca and Attorney Peterson.)

THE VIDEOGRAPHER: Good morning. We're on the record. Today's date, June 19th, 2019. The time is 8:00 a.m. This deposition is being held at 2 East Mifflin Street, Suite 102, Madison, Wisconsin. Caption of the case, Scott Weaver versus Champion Petfoods USA, Inc., et al., United States District Court, Eastern District of Wisconsin, Milwaukee Division. Case number, 18CV1996JPS.

My name is Jon Hansen, CLVS, videographer with Verbatim Reporting, Madison, Wisconsin. At this time, if counsel could please state their appearances for the record, after which our reporter will swear in the witness and we can proceed.

MS. BACA: Elisa Baca from Greenberg Traurig on behalf of Defendants Champion Petfoods.

MR. COULSON: David Coulson is also in the deposition on behalf of Champion Petfoods.

MS. PETERSON: Rebecca Peterson of Lockridge Grindal Nauen on behalf of Plaintiff Scott Weaver.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 5

1 SCOTT WEAVER,
2 called as a witness being first duly sworn in
3 the above case testified under oath as follows:
4 EXAMINATION
5 By Ms. Baca:
6 Q Good morning, Mr. Weaver.
7 A Good morning.
8 Q Would you please state your name for the record.
9 A Scott A. Weaver.
10 Q Thank you. And what is your address?
11 A [REDACTED], Wisconsin [REDACTED]
12 Q Thank you. And your business address?
13 A Same address.
14 Q Okay. Do you have any e-mail address that you
15 use?
16 A Yes.
17 Q And what is your e-mail address?
18 A [REDACTED]
19 [REDACTED]
20 Q Do you have any others that you use?
21 A No.
22 Q Okay. And what is your date of birth?
23 A 5-10-57.
24 Q Are you represented by counsel today?
25 A Yes.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 6

1 Q And is your counsel Ms. Peterson?
2 A Yes.
3 Q Thank you. I'd like to introduce what I'll mark
4 as Exhibit 1.
5 (Exhibit No. 1 marked for
6 identification.)
7 Q Have you seen this before, Mr. Weaver?
8 A Yes.
9 Q Is that your name indicated on the document?
10 A Yes.
11 Q And does it indicate that you are to be present
12 here today for the deposition?
13 A Yes.
14 Q Thank you. Have you ever been deposed before?
15 A Never.
16 Q All right. Well, I'd like to go over some ground
17 rules for today, if you don't mind.
18 So if you don't understand something that I'm
19 asking you, please just ask me to clarify, and
20 I'll rephrase the question.
21 A Okay.
22 Q And if you can't hear me, please let me know, and
23 I'll just speak up and repeat myself.
24 A Okay.
25 Q And I will need you to please answer audibly today

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 7

1 so that the court reporter can hear what you're
2 saying and write things down correctly. Please
3 don't respond with "nuh-uhs" or "uh-huhs." We
4 need to respond with clear yeses or noes for the
5 court reporter.
6 A Yes.
7 Q Are you on any medications today that may impair
8 your memory or ability to recall or answer
9 truthfully?
10 A No.
11 Q So did you prepare for today at all?
12 A Prepare for today?
13 Q Yes.
14 A Just understanding what I know.
15 Q Okay. And what did you do to prepare? Did you
16 read anything? Did you speak with anyone?
17 A I read the article -- the paperwork that's been
18 sent to me by my attorneys and spoke with my
19 attorneys. That's it.
20 Q That --
21 MS. PETERSON: I'm going to object
22 as to going into any of the type of
23 conversation or content of any conversation
24 with myself and Weaver from attorney/client
25 privilege and instruct him not to answer as

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 8

1 to the fact of the communications between he
2 and I, please.
3 MS. BACA: Agreed.
4 Q By "article," do you mean any news articles or --
5 A No.
6 Q -- online articles?
7 A No.
8 Q No? Okay. Are you referring to just the papers
9 that have been filed --
10 A Just the papers --
11 Q -- in the lawsuit?
12 A -- that have been filed.
13 Q Okay. Great. And about how long did you spend
14 reviewing these documents?
15 A 15 minutes.
16 Q Okay. So I'd like to ask you a little bit about
17 yourself.
18 A Okay.
19 Q Are you currently married?
20 A Yes.
21 Q Is this your first marriage?
22 A Yes. 43 -- 44 years.
23 Q Congratulations. And what is your spouse's name?
24 A Susan.
25 Q What's her full legal name?

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 9</p> <p>1 A Susan Kay Weaver. 2 Q And what is her date of birth? 3 A 3-31-57. 4 Q And is she currently employed? 5 A No. 6 Q Okay. 7 MS. PETERSON: I'm also going to 8 put on record that I'm going to designate 9 this confidential as to specific information 10 as to -- 11 MS. BACA: Okay. 12 MS. PETERSON: -- date of births, 13 etc. So we can review that once we get the 14 actual transcript, but until then, I would 15 like it deemed confidential. 16 Q And is your wife a plaintiff in this lawsuit? 17 A No. 18 Q And why not? 19 A She -- she's very emotional about this whole 20 situation. 21 Q Of course. 22 A And she did not feel comfortable. I'll be honest 23 with you. 24 Q Okay. 25 A So I'm -- I'm the spokesperson.</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 11</p> <p>1 outside of your job? 2 A Honestly, probably our dogs. We -- we -- our dogs 3 are therapy dogs. So we do hospital visits. My 4 wife does school. One of them is an AKC titled 5 literacy R.E.A.D. dog. That's what we do, 6 volunteer work. 7 Q That's great. Thank you. And did you attend high 8 school, Mr. Weaver? 9 A Yes. 10 Q Where did you graduate? 11 A From Logan -- Logan High School in La Crosse, 12 Wisconsin. 13 Q Great. And did you attend a college or trade 14 school afterwards? 15 A A little bit of trade school. 16 Q And what did you study there? 17 A Business. 18 Q Okay. What is the name of the trade school you 19 attended? 20 A WWTC. 21 Q Did you receive a degree or certificate -- 22 A No. 23 Q -- at all? No? Okay. I'd just like to go over a 24 little bit of some of the coursework that you 25 might have done in your schooling.</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 10</p> <p>1 Q Understood. And did your spouse buy 2 Champion's pet food, or did only you buy it? 3 A No. We both did. 4 Q Okay. And do you have any children? 5 A Yes. 6 Q How many children do you have? 7 A Three sons. 8 Q How old are they? 9 A Wow, you're testing me. 44. He's a -- the 10 captain in the police force. I've got a 11 38-year-old that is a police officer, and then 12 [REDACTED] 13 Q Does anyone currently reside at your home besides 14 you and your spouse? 15 A [REDACTED]. 16 Q And where did you grow up, Mr. Weaver? 17 A I actually grew up in Madison. 18 Q And you've lived here your whole life? 19 A No. We've lived in eight different houses from 20 Minnesota to New York to Oklahoma back to 21 Wisconsin. 22 Q Okay. And how long have you currently resided in 23 Fitchburg? 24 A Close to 20 years. 25 Q Okay. Do you have any hobbies or interests</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 12</p> <p>1 A Okay. 2 Q Did you take any courses in chemistry? 3 A No. 4 Q How about nutrition? 5 A No. 6 Q Biology? 7 A No. 8 Q Animal biology? 9 A No. 10 Q Toxicology? 11 A No. 12 Q Any other general science courses -- 13 A No. 14 Q -- that you can recall? 15 A Strictly business. 16 Q Okay. In your business courses, did you take any 17 marketing classes? 18 A Yes. 19 Q Okay. How about advertising classes? 20 A No. 21 Q Okay. Did you attend any other types of college 22 or trade schools -- 23 A No. 24 Q -- afterwards? No? Do you hold any other 25 degrees, certifications, licenses?</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19	Videotaped Deposition of SCOTT WEAVER, 6-19-19
<p style="text-align: right;">Page 13</p> <p>1 A Nope.</p> <p>2 Q Okay. So I'd like to go over your employment</p> <p>3 history, if you don't mind.</p> <p>4 A Okay.</p> <p>5 Q What was your first job after you finished your</p> <p>6 trade school?</p> <p>7 A Started two days after high school.</p> <p>8 Q Okay. Tell me about that.</p> <p>9 A As a janitor in a grocery warehouse. Worked my</p> <p>10 way up to VP of procurement, responsible for</p> <p>11 \$300 million worth of buying product.</p> <p>12 Q And what kind of product were you buying?</p> <p>13 A Non-foods; health and beauty care, general</p> <p>14 merchandise for grocery stores. I tell people</p> <p>15 that the grocery industry is a lot like the</p> <p>16 military. You move, because there's a lot of</p> <p>17 transitions. And that's -- that's why we moved so</p> <p>18 much. I kept getting promoted, and the company</p> <p>19 was acquired by another company, and then you'd</p> <p>20 move with -- with them to go to their corporate</p> <p>21 office.</p> <p>22 Q And can you describe just a little bit of your job</p> <p>23 responsibilities in that role as VP of</p> <p>24 procurement?</p> <p>25 A I had the staff of about 20 people, and then they</p>	<p style="text-align: right;">Page 15</p> <p>1 A Sold to mostly independent pharmacies around the</p> <p>2 country. Family-owned business.</p> <p>3 Q And what was your role with Promotions Unlimited?</p> <p>4 A I was a VP of sales. I would travel the country</p> <p>5 prospecting new customers, and then they had a lot</p> <p>6 of shows at their facility, and I would drive</p> <p>7 back -- I -- I was committed to our son and his</p> <p>8 recovery process.</p> <p>9 Q Of course.</p> <p>10 A So I -- we moved back to Madison, bought a house</p> <p>11 in the same neighborhood where we lived before so</p> <p>12 he would be familiar with it, and then I took a</p> <p>13 job in Racine, which is 112 miles. I would drive</p> <p>14 in the morning and 112 miles home --</p> <p>15 Q Wow.</p> <p>16 A -- for eight and a half years.</p> <p>17 Q What a commitment. Did you have a job that</p> <p>18 followed your role --</p> <p>19 A Oh, yeah.</p> <p>20 Q -- at Promotions Unlimited?</p> <p>21 A Oh, yeah. I had a lot of jobs in the same field.</p> <p>22 Q Okay.</p> <p>23 A After Promotions, I went to a company called</p> <p>24 Echo Bridge, and we sold DVDs. And then after</p> <p>25 that for about two and a half years, we saw the</p>
<p style="text-align: right;">Page 14</p> <p>1 reported to me, and they were category managers</p> <p>2 and turn buyers. So they would basically keep our</p> <p>3 warehouse full so the stores had product to buy.</p> <p>4 Q And how long were you employed in this position?</p> <p>5 A Three years at the time.</p> <p>6 Q Okay. And after this position, what was your next</p> <p>7 job?</p> <p>8 A I was the director of merchandising for Nash Finch</p> <p>9 up in Minneapolis. Same basic responsibilities.</p> <p>10 Q Could you please spell that Nash -- is it Nash?</p> <p>11 A Nash, N-A-S-C-H -- or N-A-S-H, Finch, second word.</p> <p>12 Q Okay. And what is Nash Finch?</p> <p>13 A Nash Finch was a grocery wholesaler. They've been</p> <p>14 acquired by Spartan Foods out of Grand Rapids. So</p> <p>15 now they're called Spartan Nash. [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 Q Understood. After Nash Finch, where did you work</p> <p>19 next?</p> <p>20 A Company in Racine, Wisconsin.</p> <p>21 Q And what company was that?</p> <p>22 A It was called Promotions Unlimited.</p> <p>23 Q And --</p> <p>24 A I was a VP of sales.</p> <p>25 Q And what did Promotions Unlimited sell?</p>	<p style="text-align: right;">Page 16</p> <p>1 writing on the wall about five years ago that DVDs</p> <p>2 were dying, and we started up a company selling</p> <p>3 cell phone chargers and cables.</p> <p>4 Q And is it a company that you own, Mr. Weaver?</p> <p>5 A No. I'm not an owner, but I'm in charge of sales</p> <p>6 for my division.</p> <p>7 Q And what is the company called?</p> <p>8 A It's called MobilEssentials, the last part of my</p> <p>9 e-mail address.</p> <p>10 Q Understood. So in your role there, you're selling</p> <p>11 cell phone --</p> <p>12 A Accessories.</p> <p>13 Q -- accessories?</p> <p>14 A Chargers, cables, products -- similar products</p> <p>15 across the country. I have responsibility for</p> <p>16 probably 8,000 stores.</p> <p>17 Q And these 8,000 stores are located where?</p> <p>18 A All -- everywhere from Alaska, Hawaii, all of the</p> <p>19 US.</p> <p>20 Q National?</p> <p>21 A National.</p> <p>22 Q And you work out of the home, Mr. Weaver?</p> <p>23 A Yes.</p> <p>24 Q Okay. So now we've talked about a variety of</p> <p>25 sales positions that you have held and a variety</p>

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 17</p> <p>1 of companies. Have you ever been involved in the 2 sale of dog food? 3 A Dog food? No. 4 Q Okay. No marketing of dog food, nothing of the 5 sort? 6 A Of dog food, no. 7 Q Okay. Thank you. I'm just going to go over a 8 couple other training experiences that you might 9 have had. 10 Do you have any experiences in veterinary 11 medicine? 12 A No. 13 Q Okay. Have you received any training in pet 14 nutrition? 15 A No. 16 Q Have you received any training in veterinary 17 toxicology? 18 A No. 19 Q And do you have any medical training? 20 A No. 21 Q And you're not trained as a lawyer, correct? 22 A As a lawyer? No. 23 Q Okay. Have you ever owned your own business? 24 A Yes. 25 Q And what business was that?</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 19</p> <p>1 head. 2 Q Okay. 3 A And I'm not -- I am not a -- and what are they? 4 What do they call them? The -- all of the 5 different things that everybody's on nowadays, 6 I'm -- Twitter or all of those things, I don't do 7 them. I don't participate. 8 Q Okay. You just anticipated -- 9 A My wife keeps telling me that I should, and I keep 10 telling her, "I don't want to get messed in with 11 that stuff." I mean, I don't have friends. I 12 don't like things. I don't do any of that. So -- 13 Q Okay. You anticipated my next question. We can 14 go through it quickly. 15 So you've never had a Facebook? 16 A No. 17 Q You've never had a Twitter? 18 A No. 19 Q And you've never had an Instagram? 20 A No. Don't want to. 21 Q Even if you don't have an account, have you ever 22 dabbled on the websites at all? 23 A I may have linked to one not knowing that it was 24 a Twitter thinking I was doing a search for 25 something else.</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 18</p> <p>1 A I was an independent broker/rep selling general 2 merchandise. 3 Q What was the name of your company? 4 A Sons III, Roman numerals, LLC. 5 Q What kind of general merchandise was that? 6 A Everything from sheets to blankets to socks to 7 anything general merchandise-related for the 8 grocery industry. 9 Q So your target audience were grocers? 10 A Yes. 11 Q Okay. And have you ever recommended pet food to 12 anyone? 13 A Recommended pet foods? I don't think I -- maybe 14 in general conversation with people with friends 15 or whatever, but no. 16 Q Okay. Nothing that you recall in particular? 17 A No. 18 Q Specific brands? 19 A No. 20 Q Okay. So in your role with MobilEssentials, do 21 you consider yourself to be pretty tech savvy? 22 A No. 23 Q No? 24 A I mean, I'm computer literate. I can do e-mails. 25 I file everything that I have, but I'm not a tech</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 20</p> <p>1 Q Understood. 2 A Or a Facebook, yeah. 3 Q Have you ever interacted with any posts on 4 websites like this about heavy metals? 5 A No. 6 Q How about BPA? 7 A No. 8 Q How about pentobarbital? 9 A No. 10 Q How about pet nutrition? 11 A No. 12 Q So you kind of mentioned or hinted at your wife 13 enjoys posting on social media and enjoys her 14 accounts. Has she ever shown you anything related 15 to heavy metals? 16 A No. 17 Q How about BPA? 18 A No. 19 Q How about pentobarbital? 20 A No. 21 Q How about pet nutrition? 22 A We probably talked about nutrition because of the 23 dogs. 24 Q Okay. 25 A Not necessarily that it was on the internet, but,</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 21

1 you know, we -- we pay close attention to our
2 dogs.
3 Q Understood. Of course.
4 A And as far as my wife's account, I mean, she has,
5 like, 30 friends. She's very particular. She
6 doesn't -- you know, her brother -- her brother
7 has, I want to say, 2,600 that he follows
8 constantly and -- and my wife said, "I will never,
9 never do that. I don't want people to know my
10 political backgrounds or whatever." So --
11 Q Makes sense. Makes sense. All right. So would
12 you mind if we talked a little bit about the
13 dogs --
14 A Sure.
15 Q -- that are the subject of the complaint? All
16 right.
17 So let's just first start off by if you could
18 tell me the names of your dogs.
19 A We have a -- we've had many dogs through our life,
20 but the dogs that we had recently were Jack, Jill,
21 and Prince Harry.
22 Q Okay. And these are the three dogs that are
23 mentioned in the complaint?
24 A Mm-hmm.
25 Q Could you tell me what breed your dogs are.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 22

1 A Purebred golden retrievers.
2 Q All three of them?
3 A All three of them.
4 Q All right. And about how old are your dogs? I
5 think some of them passed away.
6 A Jack and Jill were 10 -- excuse me, 11 and 10.
7 Q Okay.
8 A And then Prince Harry is eight. He's still with
9 us.
10 Q Could you tell me when Jack and Jill passed away.
11 A Jill actually passed last year. I think it was in
12 April, and Jack was in May. Within two and a half
13 weeks, we lost both of them to cancer.
14 Q So Jill was April 2018, and Jack was May 2018?
15 A Mm-hmm. Yes. Sorry.
16 Q Do you know what kind of cancer your dogs had?
17 A Honestly, I don't remember the name. I just know
18 that they had cancer. One had nasal cancer. The
19 other one -- Jill passed extremely suddenly, and
20 when we went to the vet at 1:30 in the morning,
21 she lasted about 20 minutes after convulsing at
22 our house, and she passed away. We were told that
23 it was -- her internal organs had basically
24 infested with cancer and blew up. So --
25 Q That's so sad. I'm so sorry.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 23

1 So was it the veterinarian that told you
2 about the cancer for both dogs?
3 A Yes.
4 Q Okay. And did the vet perform some sort of
5 testing to figure this out?
6 A Honestly, I don't know what testing they did.
7 Jill, it was an ER vet. It was rather sudden.
8 She had played, had a good, hard day all day long.
9 She was struggling when we went to bed. We
10 thought she just kind of pulled a muscle in her
11 leg. We went upstairs, went to bed. She started
12 convulsing and threw up in the house.
13 I threw her in the car. We went to the vet.
14 It was probably a matter of 30 minutes,
15 40 minutes. They couldn't get blood pressure
16 because everything was going wacky and --
17 Q I'm sorry, Mr. Weaver. That's so scary.
18 A That's okay. She -- she was a very strong dog,
19 and she ended up passing away.
20 MS. PETERSON: If you would like --
21 do you want to take a break right now, or are
22 you okay?
23 THE WITNESS: No.
24 MS. PETERSON: I'm just -- and for
25 the record, I'm just going to put an

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 24

1 objection as to the relevance as to the
2 health, which we've put in the documents.
3 It's just going to be standing. So I'm not
4 going to be constantly be interrupting you
5 but I just -- for the record.
6 MS. BACA: Understood, Rebecca.
7 A Then we -- after she passed, we -- the vet was
8 going to, you know, do what they do with the dogs,
9 and we said no. I -- I carried her to the car,
10 and we slept with her that night in our bed. Then
11 I took her to the crematory.
12 Q I'm so sorry, Mr. Weaver. We do not need to go
13 into the specifics of this at all, but I
14 understand if you want to talk about it to honor
15 her memory today.
16 A Okay.
17 Q Would you like to talk about Prince Harry?
18 A Prince Harry is wonderful. He's an extremely
19 likeable dog. He's jumped into the role that Jill
20 had as a literacy dog at school. The kids love
21 her -- love him. They loved Jill. They still
22 talk about Jill. Kids run up to my wife and say
23 that they miss her and Jack because Jack did that
24 before that, but Prince Harry stepped right in,
25 and he's been doing a fantastic job.

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 25</p> <p>1 He's a big golden retriever. We -- my wife 2 will tell people when they ask the name and we 3 say, "It's Prince Harry," and they start laughing 4 and they go, "Prince Harry?" And she said, 5 "Because he's just like Prince Harry." Well, it 6 was when Prince Harry was young. He was 7 flamboyant. He is all about Prince Harry, and 8 that's what he is. 9 We were just at the dog park last night with 10 two other dogs, a neighbor dog, and we were 11 running around, and that's just what he does. He 12 plays hard, and he's eight years old. 13 Q That's awesome. Can you explain to me a little 14 bit about what a literacy dog is. I've never 15 heard of that term. 16 A He -- a literacy or R.E.A.D. dog. They basically 17 go into the schools. They -- my wife has been 18 going to the same school for about nine years, and 19 it's a school that's in a -- it's a -- it's a very 20 diverse school base of kids. A lot of the kids 21 are very -- come from troubled homes and things. 22 It's not -- it's in -- I don't want to say the 23 hood. It's in a -- it's in a low economic area, 24 and that's what she loves to do with these kids, 25 and we do parties every -- for birthday parties.</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 27</p> <p>1 in our yard or on our leash with us when we walk. 2 Q Okay. 3 A Madison is very big for the farmer's market on 4 Saturdays. We would walk the farmer's market. 5 You cannot walk on the market. You walk outside 6 the square. And we would walk with the dogs to 7 socialize them, and we would have people lined up 8 taking pictures because you've got three beautiful 9 golden retrievers. People love to interact with 10 you. And that's -- it's -- we would draw crowd, 11 and we would do that all the time. 12 Q So your dogs were usually on leashes? 13 A Oh, yeah. 14 Q Okay. And where did you get your dogs? Were they 15 from a breeder? 16 A Yes. 17 Q Were there any relation between three dogs? Were 18 they siblings or -- 19 A They -- they were -- I don't think parents were 20 the same. They were all the same breeder, but he 21 has several different dogs. 22 Q Okay. How would you describe Prince Harry's 23 health? 24 A Right now, excellent. We have not had any 25 problems with him.</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 26</p> <p>1 We do birthday parties for the dogs. We do pizza 2 parties for the kids at Christmas. Some of the 3 kids in the school have never had a pizza from 4 Pizza Hut or on outside pizza. 5 Although, I remember when my wife, one of the 6 times she said, you know, "I need to have you 7 order these pizzas for the kids." So I -- I would 8 take care of that and get everything lined up for 9 her, and she said, "Oh, this one little boy was so 10 tickled. He wanted to meet the pizza driver 11 because he's never seen a pizza driver deliver 12 pizza. I'm just going, "It's hard to believe that 13 there are kids that don't experience some of these 14 things," but the kids, they would read to the dog 15 and pet them as they're reading because kids are 16 conscious of their reading ability and other kids 17 may laugh or snicker. Dogs won't laugh or 18 snicker. They're going to give you unconditional 19 love, and that's what he does. 20 Q Understood. That makes a lot of sense. 21 So tell me about your three dogs. When you 22 had them, were they indoor dogs, outdoor dogs? 23 How would you describe them? 24 A Our dogs are pampered. Okay? We have a metal -- 25 metal wrought iron fence around our yard. They're</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 28</p> <p>1 Q That's great. 2 A That I know of. 3 Q That's great. So I know we discussed that the 4 veterinarian thought your two dogs passed from 5 cancer? 6 A Mm-hmm. 7 Q Was there any discussion with your veterinarians 8 about heavy metal poisoning? 9 A We've never discussed heavy metals, no. 10 Q Okay. Was there any discussion that your dogs 11 might have consumed pentobarbital? 12 A No. 13 Q How do you -- 14 A Jack was actually diagnosed with cancer. He -- we 15 took him to the UW vet and everything, the vet 16 school, spent thousands of dollars to find out 17 what his problem was, and his -- his was a nasal 18 cancer, and it -- it grew inside his nose to the 19 point where it burst into his brain, and he was 20 bleeding through the nose for months. 21 Q That's terrifying. Did the UW vets have any 22 hypothesis or come to any conclusions about the 23 source of the cancer? 24 A No. 25 Q Okay.</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 29

1 A We never discussed that. It was all about Jack,
2 what can we do to help him or keep him good.
3 Q Absolutely. So let's transition to discuss your
4 dog's eating habits and their foods.
5 Did your three dogs ever eat any dog food
6 before eating Champion dog food or was Champion
7 the first food they were ever introduced to?
8 A No, they had a food before we went to Champion,
9 and we were recommended by a breeder to go to
10 Champion. So we switched, and I honestly couldn't
11 tell you the name of the food.
12 Q Okay. So let me try to break that down. They
13 were on a pet food before Champion?
14 A Well, when they were puppies, they were on a pet
15 food that's specifically for puppies.
16 Q Do you recall the brand name of the puppy diet?
17 A I do not.
18 Q Were all three on the same --
19 A Yes.
20 Q -- type of puppy diet?
21 A Yes.
22 Q Okay. Was there a particular reason you put your
23 dogs on the puppy diet? Did somebody recommend
24 it?
25 A Yeah. The breeders that -- when you get a puppy,

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 30

1 you always put them on puppy food to start their
2 life. It has different nutrient -- nutrients, I
3 believe, than regular dog food. I don't know that
4 much about it.
5 Q Did you conduct any research into the puppy food,
6 or was it just word of mouth?
7 A It was from the breeder telling us what's the
8 recommended thing. So we did it.
9 Q Okay. Did you know anything specific about the
10 nutritional value or just that it was aimed for
11 puppies?
12 A Just aimed for puppies and that it would help them
13 grow.
14 Q Did you know anything about the levels of heavy
15 metals in the puppy food?
16 A No.
17 Q Did you know anything about the levels of BPA in
18 the puppy food?
19 A No. If I knew anything about those levels, I
20 would never give them to one of my puppies, dogs,
21 any animal.
22 Q Understood. So why did you switch from the puppy
23 diets over to Champion dog food?
24 A Because they were not puppies any longer. So now
25 you start giving them adult food.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 31

1 Q So in your search to find an adult food for your
2 dogs, was there something specific that led you to
3 Champion's pet food?
4 A My wife did a little bit of research on different
5 brands of dog food, and then through
6 recommendations of a breeder, they mentioned the
7 Six Fish, and that -- that it would be good for
8 their coats and excellent for them, and we did,
9 like I said, a little bit of research, and we
10 thought, "Well, geez. If it's six different fish
11 in there, a reputable company. The bags are
12 vacuum sealed so that it's fresh" -- when we would
13 go to our store to buy pet food -- if you go over
14 to Mounds, which is in town here, they put little
15 circles on all the bags of pet food. Okay? And
16 the little circle denotes when they received the
17 product so that they could rotate properly. Okay?
18 When we would go in to buy our pet food, I
19 would go in. We would look at the stack of pet
20 food, and my wife would make me move every bag to
21 find the bags in the back to give them the
22 freshest pet food. And if a bag was -- the seal
23 was broke -- because in the early years when it
24 was produced in Canada, the bags were vacuum
25 sealed and was like a brick. And you picked it up

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 32

1 and you went, "This is fresh," because there's no
2 air in it to let anything get into it. So we
3 would make sure that that bag was sealed properly
4 and was hard as a rock. And if it wasn't, that
5 would go back in the pile and let somebody else
6 buy that pet food, and then we would take it home.
7 If we -- there were specific times of the
8 year, we were told, that they were having trouble
9 with getting all of the fish that are in there,
10 and sometimes our Mounds that we bought at would
11 be out. We would literally drive around Madison
12 to all of the Mounds stores to find one that we
13 would be able to purchase the exact same brand
14 because my wife was very particular, and she would
15 not change foods, because when you change foods,
16 it can upset dogs' stomachs. So she would not do
17 that.
18 We were also on the -- Mounds has a program
19 where you get a loyalty card for pet food. Okay?
20 So there's a little envelope, and I -- we don't
21 have any of the envelopes anymore because you have
22 to submit them to them, but you get an envelope --
23 a little envelope, and it's got squares on it.
24 When you buy a bag of dog food of specific brands,
25 of which Six Fish was on there, you would clip off

Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 33	Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 35
<p>1 the UPC, take your receipt, staple it to the UPC.</p> <p>2 They would put their sticker on it saying that you</p> <p>3 bought it at Mounds, and then you put it in this</p> <p>4 envelope, and then you would log when you bought</p> <p>5 it, da, da, da.</p> <p>6 And then after you bought 12 bags, you took</p> <p>7 in that envelope with all of my receipts and the</p> <p>8 UPC codes, give them to the clerk, grab another</p> <p>9 bag, which at the time, I think it was \$106 or</p> <p>10 \$108 bag. So we did not buy cheap food. And then</p> <p>11 they would give me that 12th bag free. And when</p> <p>12 you're going through a big bag of dog food at a</p> <p>13 hundred bucks every three weeks, it was well worth</p> <p>14 saving your receipts.</p> <p>15 Q Okay. So let's try to go back to the original</p> <p>16 question. Your wife conducted some research when</p> <p>17 she was looking for a dog food, correct?</p> <p>18 A A little bit of research, yes.</p> <p>19 Q Okay. And what specifically was she looking for?</p> <p>20 What qualities in a dog food did she want?</p> <p>21 A She was just looking -- I think she was looking at</p> <p>22 fat ratios or whatever. She didn't want the dogs</p> <p>23 to get fat.</p> <p>24 Q So caloric content?</p> <p>25 A Yeah.</p>		<p>1 Q Understood. So how old were your dogs when you</p> <p>2 switched them off puppy food to Champion?</p> <p>3 A Probably a year, little over a year.</p> <p>4 Q Can you tell me about how you did the transition.</p> <p>5 A We mixed puppy food with the regular food, and you</p> <p>6 mix it 50/50 to get their stomach used to it, and</p> <p>7 then we flipped them over totally.</p> <p>8 Q Okay. How long do you think that transition took?</p> <p>9 A Probably -- maybe a week, week and a half.</p> <p>10 Q Okay.</p> <p>11 A We have a feeding station for all three dogs. We</p> <p>12 had it custom made so that they can eat standing</p> <p>13 up, you know, so that they're not leaning over</p> <p>14 eating a dish on the floor. So it's a high</p> <p>15 feeding station at their chin level. All three</p> <p>16 dogs would come in. I would put a scoop into each</p> <p>17 dish, and they would eat together.</p> <p>18 Q Great. So the internet research that led you to</p> <p>19 Champion, only your wife conducted it; you didn't</p> <p>20 do any --</p> <p>21 A No.</p> <p>22 Q -- searches on your own?</p> <p>23 A I -- no.</p> <p>24 Q Did you recall what websites that she visited?</p> <p>25 A I have no idea.</p>	
Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 34	Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 36
<p>1 Q Okay. What are any qualities or characteristics</p> <p>2 that you specifically were looking for in the dog</p> <p>3 food?</p> <p>4 A No, not really, other than Jack was -- he was not</p> <p>5 on the Six Fish. He was on the -- I think it was</p> <p>6 bison or something like that, more beef because he</p> <p>7 was allergic to fish, and he would get hot spots.</p> <p>8 So we couldn't give him fish or poultry. That was</p> <p>9 the only thing that we looked at.</p> <p>10 Q Okay. So in addition to your wife's internet</p> <p>11 research, you mentioned that you received a</p> <p>12 recommendation from the breeder to get on Champion</p> <p>13 dog food?</p> <p>14 A From a breeder. Not from our breeder, but from</p> <p>15 another breeder that she had talked with.</p> <p>16 Q Okay. And what -- if you recall anything, what</p> <p>17 did that breeder say?</p> <p>18 A Just that it was excellent food, that it was --</p> <p>19 Six Fish was good for their coats. And then when</p> <p>20 we looked at the price and we went, "Well, it's</p> <p>21 over a hundred bucks. Not many bags over a</p> <p>22 hundred bucks. It's got to be good." You know,</p> <p>23 you just kind of say that to yourself, and it's</p> <p>24 not like buying Old Roy at Walmart, you know? But</p> <p>25 those dogs probably live long too.</p>		<p>1 Q Okay. Are you aware of Champion's website at all?</p> <p>2 A No.</p> <p>3 Q Have you ever visited it?</p> <p>4 A I don't think I have, no.</p> <p>5 Q Okay. There's a Champion's website. Have you</p> <p>6 visited the championpetfoods.com?</p> <p>7 A I honestly don't remember ever visiting it, no.</p> <p>8 Q Okay. How about the Acana website?</p> <p>9 A I think I did just yesterday.</p> <p>10 Q You did? What did you --</p> <p>11 A Yeah, and --</p> <p>12 Q -- look for at --</p> <p>13 A I don't think I looked at Champion. I think I</p> <p>14 looked at Acana and Orijen or whatever.</p> <p>15 Q And what did you look for on the Acana website?</p> <p>16 A I just wanted to see the pictures of the bags so</p> <p>17 that I would see -- familiarize myself with the</p> <p>18 picture of the bags. That's all I looked at.</p> <p>19 Q Okay. And where -- what jogged your memory?</p> <p>20 A Well, preparing for today. You know, I wanted to</p> <p>21 make sure I had all of my information in my head.</p> <p>22 Q Which bags on the websites specifically jumped out</p> <p>23 at you?</p> <p>24 A Six Fish.</p> <p>25 Q The Six Fish?</p>	

Videotaped Deposition of SCOTT WEAVER, 6-19-19	Videotaped Deposition of SCOTT WEAVER, 6-19-19
Page 37	Page 39
<p>1 A Because it's what we -- that one and that other 2 beef, bison, whatever it was. 3 Q Understood. Was there anything else you looked at 4 either on Acana or Orijen website? 5 A No. 6 Q Are you aware that Champion has a white paper? 7 A I couldn't tell you what a white paper is. 8 Q Understood. 9 A What is white paper? 10 Q We can talk about that after the deposition. 11 A Oh, so it's negative? Okay. 12 Q No, not necessarily, sir. Not at all. 13 A Okay. 14 MR. COULSON: Yeah, the way this 15 works is the lawyer gets to ask the 16 questions, and you're supposed to answer. 17 THE WITNESS: Yeah. 18 Q It's a little unfair. I understand. 19 Have you ever heard of a -- a Clean Label 20 Project? 21 A No. 22 Q Okay. Have you ever come across any websites, 23 articles, blogs on the internet that were against 24 Champion or said some negative things -- 25 A No.</p>	<p>1 these websites? 2 A No. 3 MS. BACA: Okay. All right. I'd 4 like to take a quick break, if you don't 5 mind -- 6 THE WITNESS: Sure. 7 MS. BACA: -- just to kind of 8 re-collect my thoughts. 9 THE WITNESS: Okay. 10 MS. BACA: All right. 11 THE VIDEOGRAPHER: Going off the 12 record at 8:38. 13 (Recess taken.) 14 THE VIDEOGRAPHER: We're back on 15 the record at 8:47. 16 Q Mr. Weaver, when were your dogs born? 17 A January -- exact birth dates, they would -- well, 18 he was 11. So 11 years ago last -- he was born 19 in -- I want to say March, and Jill was right 20 about the same time, but she was a year younger. 21 Q So was Jack born in 2008? 22 A '8? No. It would be 2007, and then Jill would 23 have been 2008. 24 Q And when was Prince Harry born? 25 A 2010.</p>
Videotaped Deposition of SCOTT WEAVER, 6-19-19	Videotaped Deposition of SCOTT WEAVER, 6-19-19
Page 38	Page 40
<p>1 Q -- about Champion? 2 A No. I don't search blogs. The only thing I do on 3 my computer is if I don't have an address for a 4 store, I say, "Stop & Shop in Massachusetts -- In 5 Chelsea, Massachusetts. Here's the address. Give 6 me the phone number." That's what I do. 7 Q Understood. Has your wife ever shown you anything 8 of this sort? 9 A No. 10 Q Okay. I'm just going to run through a couple pet 11 food blogs. Tell me if you've visited these 12 websites or heard -- or heard of them. 13 A Okay. 14 Q The Truth About Pet Foods? 15 A No. 16 Q Petfoodindustry.com? 17 A No. 18 Q Dogfoodadvisor.com? 19 A No. 20 Q Chagrinfallspetclinic.com? 21 A No. 22 Q How about your veterinarian? Does your 23 veterinarian have a website that you visited? 24 A I never did, no. 25 Q Okay. And has your wife shown you anything on</p>	<p>1 Q How old were your dogs when you bought them from 2 the breeder? 3 A Eight weeks, I think we get them. 4 Q Okay. So you purchased your dogs -- Jack first, 5 Jill about a year later, and two years after that, 6 Harry? 7 A Mm-hmm. 8 Q Do any of your dogs have any offspring? 9 A No. One of the stipulations with the breeder is 10 you're not allowed to -- you're not allowed to 11 breed. I don't -- I don't stay in touch -- or we 12 don't stay in touch with people that would have 13 had offspring, the brothers and sisters, no. I'm 14 sure there are, but I don't know. 15 Q Who is your breeder? 16 THE WITNESS: Bless you. 17 MS. PETERSON: Thank you. 18 A Dichi. 19 Q Could you please spell that. 20 A D-I-C-H-I. 21 Q And where is Dichi located? 22 A Portage, Wisconsin. 23 Q What are the names of the veterinarians that saw 24 your dogs when they started getting sick? 25 A Jesse Sondel and then -- that was our vet, and</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19	Videotaped Deposition of SCOTT WEAVER, 6-19-19
Page 41	Page 43
<p>1 then the UW vet, I can't tell you what his name</p> <p>2 is. We only saw him twice.</p> <p>3 Q Have your three dogs visited any other vets</p> <p>4 besides those two?</p> <p>5 A Now, Prince -- we switched our vet to</p> <p>6 Odyssey Clinic, which is a mile from our house.</p> <p>7 And our vet, Jesse Sondel, was -- he does all of</p> <p>8 the -- all of the -- I don't want to call it</p> <p>9 prenatal. I -- it -- for the puppies. He's --</p> <p>10 he's for our breeder. He does all of the</p> <p>11 artificial insemination and all of that stuff. So</p> <p>12 he works really close with our breeder.</p> <p>13 Q Has Jesse ever recommended pet food for you?</p> <p>14 A No.</p> <p>15 Q Have you ever asked Jesse for his opinion on pet</p> <p>16 food?</p> <p>17 A I don't believe so, no.</p> <p>18 Q How about the UW veterinarians?</p> <p>19 A No.</p> <p>20 Q Have they ever recommended pet food?</p> <p>21 A No.</p> <p>22 Q Have you asked them anything about --</p> <p>23 A No.</p> <p>24 Q -- Champion's dog food?</p> <p>25 A No.</p>	<p>1 you're buying it because, one, we felt that it was</p> <p>2 a premium -- a high premium dog food because of</p> <p>3 the packaging, because of the cost, because of</p> <p>4 what it says on the package being -- you know,</p> <p>5 that it's made fresh basically. You get the</p> <p>6 opinion that it's fresh and all good, not anything</p> <p>7 else in it. So --</p> <p>8 Q The information that you read was only on the</p> <p>9 Champion packaging, correct?</p> <p>10 A Yes.</p> <p>11 Q Have you ever read any Champion brochures?</p> <p>12 A I don't believe so, no. I don't think I've ever</p> <p>13 seen a Champion brochure.</p> <p>14 Q Have you ever read any other print materials from</p> <p>15 Champion?</p> <p>16 A No.</p> <p>17 Q Have you ever attended a dog food trade show?</p> <p>18 A Dog food trade show? No.</p> <p>19 Q Okay. How many times approximately do you think</p> <p>20 you've visited the Acana or Orijen website?</p> <p>21 A Once, twice at the very most.</p> <p>22 Q And when did you visit those?</p> <p>23 A Just recently. Like I said, I -- I was just on it</p> <p>24 yesterday.</p> <p>25 Q Okay. So which Champion dog food diets did you</p>
Videotaped Deposition of SCOTT WEAVER, 6-19-19	Videotaped Deposition of SCOTT WEAVER, 6-19-19
Page 42	Page 44
<p>1 Q Had Odyssey Clinic given any recommendations for</p> <p>2 dog food?</p> <p>3 A No.</p> <p>4 Q Besides the recommendation of your breeder, were</p> <p>5 any other factors important to you when you</p> <p>6 decided to buy Orijen?</p> <p>7 A We would look at the label and try to decipher</p> <p>8 through the chemical names what was in it, of</p> <p>9 course, and we would look at the crude fat,</p> <p>10 whatever, things like that just to see -- make</p> <p>11 sure that we were giving them good, healthy food.</p> <p>12 You know, I was kind of -- you know, when you</p> <p>13 asked the questions about the chemicals earlier if</p> <p>14 I knew what -- honestly, I don't search that</p> <p>15 stuff, but it kind of -- it brought me back to the</p> <p>16 memory of the commercial that was on TV recently</p> <p>17 about water and when they had the water store in a</p> <p>18 big city and they had people come in, and the</p> <p>19 guy's going, "This water is really good. It's got</p> <p>20 an acceptable amount of lead in it." And people</p> <p>21 are going, "Well, I'm not going to drink that."</p> <p>22 "Well, this one's got a little bit less, but it's</p> <p>23 still" -- when you look at things for your dogs or</p> <p>24 for yourself, if you don't know what's in there,</p> <p>25 you're not going to not buy it. You know, you --</p>	<p>1 purchase for your dogs?</p> <p>2 A Six Fish. Two of them were on that, and then Jack</p> <p>3 was on -- I want to -- I get confused if it was</p> <p>4 bison or it was a beef -- it was a meat, because</p> <p>5 we couldn't do poultry or fish for him. So we</p> <p>6 went to another.</p> <p>7 MS. BACA: I'd like to mark this as</p> <p>8 <u>Exhibit 2</u>.</p> <p>9 (<u>Exhibit No. 2</u> marked for</p> <p>10 identification.)</p> <p>11 Q Mr. Weaver, do you recognize this document?</p> <p>12 A Yes.</p> <p>13 Q Could you please familiarize yourself with it, and</p> <p>14 when you're ready, please turn to page 6. If you</p> <p>15 could turn your attention to the last sentence</p> <p>16 above the word Interrogatory Number 6. Does that</p> <p>17 refresh your memory as to which diets you</p> <p>18 purchased for your dogs?</p> <p>19 A Where was it? Up here? Oh, yep. That's it.</p> <p>20 Q Could you please read it for the record.</p> <p>21 A "The Orijen Six Fish and Orijen Regional Red.</p> <p>22 Q Do you recall purchasing any other Champion dog</p> <p>23 food diets beside those two you just mentioned?</p> <p>24 A No.</p> <p>25 Q Did you purchase any Acana diets?</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 45

- 1 A Acana? No.
- 2 Q So in total, to confirm, how many Champion dog
3 food diets did you purchase?
- 4 A Names or how many bags? How many -- just those
5 two.
- 6 Q How many diets.
- 7 A Those two.
- 8 Q Okay. When did you begin purchasing your Champion
9 dog food?
- 10 A Probably a year -- like I said, after they were a
11 puppy, that's when we began getting them into
12 adult food.
- 13 Q So you purchased Jack in 2007, correct?
- 14 A Yes.
- 15 Q Did you begin purchasing Champion dog food
16 in 2007?
- 17 A No. As I said earlier, you feed them puppy for a
18 year. Then you feed them adult food. You wean
19 them into adult food.
- 20 Q Okay. So approximately what year do you think he
21 began --
- 22 A Approximately 2008.
- 23 Q Okay. And do you recall when you stopped
24 purchasing Champion dog food?
- 25 A When they were -- both died of cancer.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 46

- 1 Q Approximately what --
- 2 A Last year.
- 3 Q -- month and year?
- 4 A Last year, May. We threw it all away, and we
5 bought new food.
- 6 Q May of 2018?
- 7 A Yes.
- 8 Q So you stated that you threw away all of the dog
9 food in May of 2018?
- 10 A Correct.
- 11 Q How did you transition Prince Harry to the next
12 food that he started eating?
- 13 A We would have transitioned by giving him a little
14 bit of the other food and this new food that we
15 switched him to --
- 16 Q Okay.
- 17 A -- for less than a week.
- 18 Q I'd like to discuss how frequently you purchased
19 Champion dog food. How many bags did you buy per
20 month?
- 21 A At least one bag of each per month. Probably
22 every three weeks.
- 23 Q When you say, "one bag of each," do you mean one
24 bag of Six Fish?
- 25 A Six Fish and one of the Regional Red. We would

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 47

- 1 buy the smaller bag of the Regional Red because we
2 only had one dog on that one. And you can't
3 combine the receipts. You have to have of the one
4 brand to get your free bag. So --
- 5 Q You're talking about the Mounds loyalty program?
- 6 A Yes.
- 7 Q Okay. Do you recall how small the Regional Red
8 bag was, how many pounds it was?
- 9 A I don't recall the weight. It was next level
10 down. We would buy the big bag of Orijen, and the
11 next bag down was the Regional Red.
- 12 Q Okay. How did you find out that Jack had a fish
13 allergy?
- 14 A He was itching.
- 15 Q Did you take him to the vet?
- 16 A Yes.
- 17 Q What did the vet tell you?
- 18 A He -- he actually did an allergy -- what are they
19 called? A blood marker or whatever, and told us
20 that he was allergic to poultry and allergic to
21 fish. So then we put him on a more strict diet of
22 beef, bison.
- 23 Q Did the veterinarian recommend the beef and bison?
- 24 A He didn't recommend the food, no. He just told us
25 not to feed him a fish base or poultry.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 48

- 1 Q Do you recall around what year it was that you
2 figured this out?
- 3 A Probably that 2008. Sometime in late 2008.
- 4 Q If you began purchasing Champion dog food in 2008
5 and later that year you found out that Jack was
6 allergic, approximately how long do you expect
7 that Jack was eating Champion's Orijen Six Fish?
- 8 A Six Fish? Probably less than a year. Eight
9 months.
- 10 Q How did you transition Jack from Six Fish to
11 Regional Red?
- 12 A Gave him a little bit of the Six and then a full
13 cup of the Regional Red.
- 14 Q How long did that take?
- 15 A Not -- a week maybe.
- 16 Q Okay.
- 17 A You're not as concerned when you're transitioning
18 from a food to a different food as you are with
19 puppy to the different food.
- 20 Q Understood. How much did you spend on your larger
21 Six Fish bag?
- 22 A I want to say it was 108 bucks.
- 23 Q And how much did the Regional Red cost?
- 24 A I'm going to guess 84.
- 25 Q How many times do you think you were able to get a

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 49

1 free bag from the Mounds loyalty program?
2 A If you did the math of three every three weeks, I
3 would say -- and you had to buy 12. 36 weeks.
4 Three times 12. 36 weeks.
5 Q So you think every 36 weeks, you received one free
6 bag?
7 A Free bag.
8 Q How many times a day did you feed your dogs?
9 A Twice.
10 Q And about what time of day?
11 A Every day. Every morning at 7:00 and at 4:00 in
12 the afternoon.
13 Q What was the amount that you fed your dogs?
14 A A full cup.
15 Q During the time period that your dogs ate
16 Champion's dog food, did they exclusively eat
17 Champion's dog food?
18 A Yes.
19 Q Did you ever feed them human foods?
20 A No.
21 Q How about treats?
22 A They would have had treats. Specific -- specific
23 holistic treats, little teeny treats that --
24 training treats. We're very particular. They
25 would not get rawhide because there's a lot of

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 51

1 the Red.
2 Q What were the containers made of?
3 A Plastic.
4 Q Did you store your dog food in anything else --
5 A No.
6 Q -- besides the plastic?
7 A Or the bag that they were in because they were --
8 the plastic is not big enough to hold the whole
9 bag. So then we would roll down the bag, seal it,
10 and put it in next to it.
11 Q What's your understanding for why Champion's
12 prices are set at what they're set at?
13 A Because of the quality and the expense that they
14 go through to make what we perceived as being
15 quality dog food.
16 Q What's the total amount you estimate you spent on
17 Champion's dog food?
18 A Wow.
19 Q You can ballpark it.
20 MS. PETERSON: Objection, calls for
21 speculation, but you can answer.
22 A Well, I mean, it's a calculation. Again, if you
23 figure 108 dollars times 12 times -- and then you
24 have to add in a couple extra -- probably 1,2-,
25 \$1,400 for the Six Fish a year.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 50

1 arsenic in foreign rawhide that comes over. So we
2 would never buy rawhide for them.
3 Q Do you remember brand of the holistic treats?
4 A No, I don't.
5 Q Were there any other treats beside the holistic
6 treats?
7 A No.
8 Q How often did you feed them treats?
9 A When they were rewarded. When they would go
10 outside to go to the bathroom, and they got a
11 treat when they came in. She would take some with
12 when she goes to school. So -- to keep them
13 motivated so that, "I'm going to do good so that I
14 can have a treat."
15 Q All right.
16 A When we walked them on the square, we would have
17 some treats.
18 Q To confirm, once your dogs started consuming --
19 besides Jack, when Jill and Harry started
20 consuming the Six Fish, did they ever alternate
21 any of their diets?
22 A No. And we had containers -- separate containers
23 in that feeding station. It had a lid that opened
24 up, and we had separate containers that -- the
25 Six Fish was in here, and other one was in here,

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 52

1 Q Mm-hmm.
2 A And the other one was probably 200, 300 hundred
3 less than that. So probably \$2,500 times eight
4 years. What's that? 20 grand?
5 Q Where did you buy your Champion's dog food?
6 A Mounds Pet Food in Fitchburg. And like I
7 mentioned earlier, when they would run out, we
8 would have to find another Mounds to buy it at.
9 Q Would you only purchase at Mounds?
10 A Yes, because of the loyalty program. I -- if you
11 can save a hundred bucks, it's worth it.
12 Q Is Mounds a small chain?
13 A They're a regional -- I want to say they have six
14 or eight stores.
15 Q Okay. And you never bought the dog food directly
16 from Champion, correct?
17 A No.
18 Q Did you ever do any internet purchases of --
19 A No.
20 Q -- Champion dog food? Is Mounds only a brick and
21 mortar store? You can't purchase online?
22 A I honestly don't know. I've never -- we've never
23 purchased online from them. They may have one. I
24 don't know.
25 Q Did Mounds ever put Champion dog food on sale?

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 53</p> <p>1 A No, because of the loyalty program. And I 2 know they will special order things, Mounds does, 3 for it, because we special ordered custom leather 4 collars and leads for all three of them. 5 Q Who in your household would purchase the Champion 6 dog food? 7 A Either Susan or myself. 8 Q Okay. 9 A Usually we're always together because you can take 10 dogs in the store. The dogs go in. They meet 11 people. So we would take all three in at the same 12 time, make it an event. 13 Q Do you have any friends or anyone else you know 14 that also buys Champion dog food? 15 A No. 16 Q Okay. Do you recall approximately how much the 17 puppy food was? 18 A Price? 19 Q Yes. 20 A I -- no, it would be a guess -- a total guess if I 21 guessed at it. 22 Q Okay. So when you stopped purchasing Champion dog 23 food around May 2018, when did you -- you started 24 making the switch to another dog food for -- for 25 Prince Harry, correct?</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 55</p> <p>1 They would tell us, "It's in Sun Prairie, or it's 2 in Middleton," and I would call up and say, "Hold 3 a bag for me so I can come over and pick it up." 4 Q Okay. Have you talked to a Mounds employee about 5 the Purina Focus? 6 A No. The employees are pretty much young kids. 7 They don't know anything. 8 Q Did the Mounds employees talk to you about Orijen? 9 A No. 10 Q Okay. When you said your wife did some research 11 into the Purina Pro Plan Focus, what 12 considerations were going into the research? 13 A I'm sure she just looked at the ingredients to see 14 if what she knew of whether it was good food for 15 them. 16 Q What makes a good food? 17 A Looking at the nutritional guidelines that are on 18 the package. 19 Q Are you familiar with AAFCO? 20 A No. 21 Q When you look at nutritional guidelines, do you 22 only look at what the bag is telling you? 23 A Yes. 60 percent of the things of the ingredients 24 you can't understand anyhow. 25 Q How much does your Purina food cost?</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 54</p> <p>1 A Mm-hmm. 2 Q And what dog food was that? 3 A We switched to Purina Focus Large Breed. 4 Q If I'm correct, there's a couple different lines 5 that Purina has. Was there a specific one that 6 you remember? Is it for sports or health or 7 sensitive -- 8 A Pre -- no, it was Purina Focus Large Breed. 9 Q And why did you pick this food? 10 A I would say because we researched a little bit to 11 find out what was a good food, and I think she may 12 have talked to a breeder in Massachusetts. 13 Q Do you recall what the breeder said? 14 A I think she recommended it. 15 Q Do you recall anything specific that she said? 16 A No. 17 Q Have you or your wife ever talked to a Mounds 18 employee about the dog foods that you have bought? 19 A As far as what? 20 Q Have you asked them their opinion on -- 21 A No. 22 Q -- Champion dog food? 23 A The only thing we would have asked is, "Okay. 24 You're out of it. When are you getting it in?" 25 If they couldn't tell us, search the other stores.</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 56</p> <p>1 A Six -- 68, I think it is. 2 Q \$68? 3 A Yeah. 4 Q What size bag are you buying? 5 A 42, I think it is. 42 pounds. 6 Q What is the main ingredient or protein source in 7 the Purina food? 8 A I couldn't tell you right now. 9 Q Do you recall if it's a chicken based diet, beef 10 based? 11 A I would say it's more beef than it's chicken. 12 Q Can you describe the food to me? Is it a dry 13 kibble? 14 A Yes. About that big. 15 Q Okay. Is the food grain-free? 16 A I believe it is. 17 Q Was that a factor in your decision? 18 A I think it is, yes. 19 Q And why? 20 A Just that we wanted more protein for them so they 21 could be stronger, and in our opinion, when you 22 see grain, you think it's just filler. 23 Q Why did you stop buying Champion dog food? 24 A We had two dogs that died of cancer, and it cost 25 me thousands of dollars.</p>

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 57</p> <p>1 Q Did you believe that the food was the source of 2 your dog's illness? 3 A Yes. 4 Q Why? 5 A Because that's not in our line. We talked with 6 the breeder. He insisted he didn't have cancer in 7 his line, and he's -- basically, we kind of said, 8 "It's got to be something they're eating. Throw 9 that dog food away and get something different." 10 Q Did the veterinarians ever mention the foods as a 11 cause? 12 A No. 13 Q Did you ask the veterinarians? 14 A I don't know if we did or not, to be honest with 15 you. We were going through a tough time at that 16 time. 17 Q Were tests ever run on the dog food? 18 A No. 19 Q Did you search whether Purina's dog food has heavy 20 metals in it? 21 A No. I wouldn't think anybody would ever put heavy 22 metals in dog food. 23 Q Are you aware of a lawsuit in the Northern 24 District of California called Lucido versus Nestle 25 Purina?</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 59</p> <p>1 Q Why do you believe that Purina is different? 2 A Because we had to give another -- I'm not going to 3 give Orijen an opportunity to kill another dog. 4 So we changed just like anybody would do. 5 Q Have you compared the nutritional value of the 6 Purina food to the Orijen? 7 A No. 8 Q Do you know if the label on the Purina food 9 mentioned anything about heavy metals? 10 A I couldn't tell you. 11 Q Do you know if the Purina label mentioned anything 12 about BPA? 13 A I couldn't tell you. 14 Q Was there anything on the packaging of the Purina 15 that led you to purchase it? 16 A Just the -- looking at the ingredients on the 17 packaging and the reading the recommendations. 18 Q Is Prince Harry eating anything else besides the 19 Purina right now? 20 A No. 21 Q How about the treats? 22 A The same treat. 23 Q Do you ever cook at home for Prince Harry? 24 A Cook for the dog? No. And we don't do any raw. 25 We would never do any raw or anything like that,</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 58</p> <p>1 A No. 2 Q Did you know that that lawsuit was suing Purina 3 because that has some heavy metals in the dog 4 food? 5 A No, I did not. 6 MS. PETERSON: Objection, 7 irrelevant. 8 Q Did you research whether Purina had BPA in its dog 9 food? 10 A No. 11 Q Did you research whether Purina has pentobarbital 12 in its food? 13 A No. Why would anybody put that in a dog food? 14 Q Besides your breeder's recommendation, were there 15 any other recommendations or considerations that 16 led you to Purina? 17 A No. 18 Q How do you believe the Purina differs from the 19 Champion dog food? 20 A We believe it's not going to make them sick and 21 die of cancer. 22 Q And why do you believe this? 23 A Because we had two dogs die of cancer, and they 24 were eating that food specifically for their whole 25 life basically other than puppy.</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 60</p> <p>1 other types of food, no. 2 Q Why not? 3 MS. PETERSON: Objection, 4 relevancy. 5 Q You can still answer the question. 6 A Because we don't cook for the dogs. I mean, it's 7 hard enough to cook for us. 8 Q Okay. 9 A Now, if they had a to-go restaurant for a dog, my 10 wife would probably say, "Hey, get a to-go dinner 11 for the -- Prince Harry." 12 Q So you mentioned your feeding station was custom 13 built? 14 A Mm-hmm. 15 Q The cylinder tubes, I imagine, that holds the 16 kibble, is that made of plastic? 17 A The bin that we put the kibble in, the less -- the 18 two smaller bins are underneath in there. Yes. 19 Q And when it comes out in the bowl -- 20 A No. 21 Q What's the bowl made of? 22 A No. They're in bins. They've got a lid on it. 23 We have a metal scoop, and we scoop it into their 24 stainless dish. 25 Q Okay.</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 61

1 A And my wife washes their dishes every night. I
2 look at her. I say, "You know they're dogs?" She
3 said, "They won't like to eat out of that."
4 "Okay." So she puts the dishes in the dish
5 washer, and she runs it every night and cleans it
6 for them.
7 Q That's great. Have you ever experienced any of
8 the following issues in any of your Orijen diets
9 that you have purchased? You can just answer yes
10 or no.
11 Any plastic ear tags?
12 A No.
13 Q Any chunks of plastic pieces?
14 A No.
15 Q Any piece of metal?
16 A No.
17 Q Any hair?
18 A I -- if I did, I would say it was golden hair, but
19 I -- no.
20 Q Any mold?
21 A No. We --
22 MS. PETERSON: Objection, relevance
23 as to -- these issues were not in our
24 complaint, but you can go ahead and answer.
25 Q Any mice?

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 62

1 A Mice? No.
2 Q Any insects?
3 A No.
4 Q How about a spray bottle?
5 A No.
6 Q A glove?
7 A No.
8 Q Any other foreign objects?
9 A No.
10 Q Have you ever heard of anyone else who had a
11 foreign object in their dog food?
12 A No. If I had a foreign object in the dog food, I
13 would question the reliability of the
14 manufacturer, and I would stop buying from them.
15 Q But this never happened to you?
16 A Never happened to me.
17 Q Off the top of your head when you're looking at
18 the Champion Orijen bags, were there any
19 statements on the bags that stood out to you when
20 you went to buy it?
21 A Just that it was made of -- I thought, "Six Fish.
22 These Six Fish, and it's fresh daily." We were
23 going, "Wow, that's why it's so expensive. Okay.
24 It's got to be good for them."
25 So on the back of the label -- can I ask a

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 63

1 question? Does it specifically say that heavy
2 metals are in them? I mean, any breeder -- or any
3 dog food, does it specifically say, "Ingredients"
4 contains heavy metal," or do they hide it in
5 another term.
6 Q Sorry I --
7 A Or do you not want to answer?
8 Q I have to ask the questions today.
9 A Okay. That's fine.
10 Q Do you believe heavy metals were added as an
11 ingredient in Champion dog food?
12 A I don't know how - if they're added, if they're
13 not added, but you keep asking about BPA,
14 phenobarbital (sic), and heavy metals; and I don't
15 understand why that question would arise. Why
16 would anybody put that in any food for a pet?
17 Q Can you review the complaints before they were
18 filed, Mr. Weaver?
19 A Yes.
20 Q And do you recall that you're suing because you
21 believe heavy metals, BPA, and pentobarbital are
22 in the food?
23 A Yes.
24 Q So how do you believe the heavy metals get into
25 the food?

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 64

1 A I -- I have no idea. I'm not a chemist. I'm not
2 at your plant.
3 Q How do you believe the BPA gets into the food?
4 A Same answer.
5 Q And how do you believe the pentobarbital gets in
6 the food?
7 A Same answer.
8 Q Why did you think heavy metals, BPA, or
9 pentobarbital is in the food?
10 A There's -- because that's -- I understand it's got
11 to be something that's causing the cancer.
12 Q How did you first hear about heavy metals being in
13 the food?
14 MS. PETERSON: Objection to the
15 point of it getting into attorney/client
16 privilege as to certain -- yeah, as to
17 discussions about the case and the nature of
18 this case, but go ahead and answer.
19 A I -- honestly, I can't recall why.
20 Q So -- okay. What is pentobarbital? What's your
21 understanding?
22 A A euthanasia drug, something. I don't know. I'm
23 not a chemist.
24 Q Understood. All right. Let's look at some of the
25 bags that you purchased, some images of the

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 65</p> <p>1 packaging. I'm going to -- 2 MR. COULSON: Probably a good time 3 for a break. 4 MS. BACA: You want to do a break? 5 Okay. We're going to take a break. Is that 6 all right? 7 THE WITNESS: Take a break. 8 MS. BACA: Thank you. 9 THE VIDEOGRAPHER: Going off the 10 record at 9:22. 11 (Recess taken.) 12 THE VIDEOGRAPHER: We're back on 13 the record at 9:29. 14 Q I'd like to introduce another exhibit. This will 15 be <u>Exhibit 3</u>. 16 (Exhibit No. 3 marked for 17 identification.) 18 Q Please take your time to look over the document. 19 And please let me know when you're ready. 20 A Okay. 21 Q Now that you have reviewed all 75 pages of the 22 second amended complaint, does this appear to be 23 an accurate copy? 24 A Yes. 25 MS. PETERSON: Objection to the</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 67</p> <p>1 Q Did I read that sentence correctly? 2 A Correctly. This October date, I think, is wrong. 3 Q So when we -- when we were discussing earlier, did 4 you mean to say that you began purchasing the pet 5 food in 2007, or what is the correct date? 6 A The end date would have been 2018, not 2017. It 7 would have been Oct -- it wouldn't have been 8 October. It would have been either April or May 9 '18. 10 Q Okay. Can we go back to <u>Exhibit 2</u>. And if you 11 could turn to page 5, please. I'm going to read 12 the last sentence of the response to interrogatory 13 number 4, which says, "Subject to the foregoing 14 objections, Plaintiff states that he fed Champion 15 dog food to his dogs beginning in January 2007 16 until approximately October 2017." 17 Did I read that correctly? 18 A You read it correctly, and I previously said that 19 I think it was April or May of 2018. 20 Q Can you please turn to page 13 of the 21 interrogatories. 22 A This document? 23 Q Yes. Is that your signature, Mr. Weaver? 24 A Yes, it is. 25 Q Attesting to the truth of the answers --</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 66</p> <p>1 narrative. 2 Go ahead. 3 Q Did you review the original complaint before it 4 was filed? 5 A Yes. 6 Q Did you review the first amended complaint before 7 it was filed? 8 A Yes. 9 Q And did you review the second amended complaint 10 before it was filed? 11 A (No audible response.) 12 Q I'd like to just go over the purchase dates with 13 you just because I might have misunderstood you. 14 If you could please turn to page 10 of the second 15 amended complaint to paragraph 20. I'm going to 16 read the second sentence. Please let me know if 17 I've read it correctly. 18 "Plaintiff Weaver purchased the contaminated 19 dog foods approximately once a month on average 20 between approximately January 2007 and 21 October 2017 generally from Mounds Pet Food Store 22 in Fitchburg, Wisconsin." 23 A What page are you reading from? 24 Q I'm on page 10 in paragraph 20. 25 A Oh, down here? Okay.</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 68</p> <p>1 A Yes, it is. 2 Q -- within here? 3 Why do you now think that the end date of 4 your purchases were incorrect? 5 A Because it was after they died, and I must have 6 put down the wrong date. 7 Q So what -- were you a member of the class that is 8 in the Central -- the original class from the 9 Central District of California case that's now the 10 Reitman case? 11 A I honestly don't know. 12 Q Okay. 13 MS. PETERSON: I would say put the 14 complaint in front of him, and he'll see. He 15 -- he's not a lawyer. He's not going to -- 16 MS. BACA: Mm-hmm -- 17 MS. PETERSON: -- probably 18 understand that question. 19 Q So are you testifying today, Mr. Weaver, that the 20 sworn information in your interrogatory answers 21 were incorrect? 22 A I'm saying that the date I may have been mistaken 23 on, correct. 24 Q What was the exact date that you last purchased 25 Champion dog food?</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 69

1 A I'm going to say April/May 2018.
2 MS. PETERSON: Objection, asked and
3 answer, and he said he's unclear.
4 Q So, Mr. Weaver, we've -- we would like to get some
5 information from Mounds Pet Food, and one of the
6 things that they've asked for us to confirm
7 whether it was your purchases were the last four
8 digits of your credit card. Could you provide
9 those to us, and we will mark this as
10 confidential?
11 A Of my credit card? Sure.
12 Q Yes.
13 MR. COULSON: Yeah. We can do that
14 through Counsel.
15 MS. BACA: Through Counsel.
16 MS. PETERSON: Yeah, that's fine.
17 MR. COULSON: And it could be his
18 wife's credit card for all we know. Whatever
19 credit cards were used to make the purchase
20 at Mounds. Mounds requires last four digits
21 to search in their system.
22 MS. PETERSON: Well, and they're
23 likely a joined account, credit cards. And I
24 will say that both counsel cannot be taking
25 the deposition here.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 70

1 MR. COULSON: I'm not asking
2 questions. I'm just trying to --
3 MS. PETERSON: You're directing her
4 with questions.
5 Q Mr. Weaver, are you purchasing your Purina dog
6 food also at Mounds?
7 A No.
8 Q Where are you --
9 A Not always. I shouldn't say that. Sometimes we
10 do; sometimes we don't.
11 Q When you are not purchasing the Purina at Mounds,
12 were you purchasing it?
13 A PetSmart.
14 Q Are you purchasing at a brick and mortar PetSmart
15 or online?
16 A Brick and mortar.
17 Q Are those only two locations?
18 A Yes.
19 Q Which PetSmart location are you purchasing from?
20 A West Madison.
21 Q Is that the only PetSmart that you have gone to?
22 A Yes.
23 Q Are you going to only the Mounds Fitchburg, or are
24 you going to several different Mounds stores?
25 A That's the only store that I go to now.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 71

1 Q Mr. Weaver, what led you to hiring counsel to file
2 this lawsuit?
3 A When we started searching after the dog -- the
4 dogs died or thereabout before that when they died
5 of the cancer, we started looking online and saw
6 an action. So then we contacted them.
7 Q You started looking for what specifically? What
8 searches were you looking for?
9 A Looking for the food to see if there was searches
10 on bad food possibly for Champion Orijen Six Fish.
11 Q Okay. And --
12 A And Regional Red.
13 Q And these searches led you to Ms. Peterson?
14 A Yes.
15 Q Beside your online searches, were there any other
16 word of mouth or any other information?
17 A No.
18 Q Okay. All right. I'd like to intro -- do you
19 remember the date that you brought Jill to the
20 emergency room because of her cancer?
21 A The exact date, I couldn't -- April -- I can get
22 it for you. I can't recall the exact date.
23 Q Okay. That's all right. All right. I'd like to
24 mark an exhibit as Exhibit 4. This is an image of
25 the Regional Red dog food that you had purchased

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 72

1 for Prince Harry. I have images the size of the
2 bag, but if for any reason you cannot read it, I
3 have larger printouts. So please let me know if
4 you would like a larger copy.
5 (Exhibit No. 4 marked for
6 identification.)
7 A That was a misstatement. This was for Jack. It
8 was not for Prince Harry.
9 Q Oh, thank you. Thank you for correcting that.
10 There you go, Mr. Weaver. Does this bag look
11 similar to the bags you purchased?
12 A Yep.
13 Q I'd like to direct your attention to the top left
14 front of the bag. It's going to be in a red
15 rectangle, and there's a statement there that says
16 "Nourish as nature intended." Do you see that?
17 A Mm-hmm.
18 Q What does that phrase mean to you?
19 A That it's natural food, and it's good, nutritional
20 food for the dog.
21 Q Is this something that you read before you
22 purchased the dog food?
23 A I would say that I read the front of the bag. Did
24 I read each word and memorize it? No, but --
25 Q Do you have any basis to dispute that the dog

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 73

1 food -- the Orijen Regional Red is not nutritious?
2 A That it's not nutritious?
3 Q Mm-hmm.
4 A I -- from looking at this, it looks like it's a
5 hundred percent nutrition.
6 Q Okay. Now going down the front, let's move down a
7 little bit towards the middle. Do you see the
8 statement here that says, "Made with regional
9 ingredients delivered fresh or raw daily"?
10 A Yes.
11 Q What does the phrase "raw" mean to you?
12 A That the product was fresh and raw before it was
13 produced into the dog food, whatever they do to
14 produce it into dog food.
15 Q And when a meat is raw, does that include putting
16 a meat on ice to keep it raw?
17 A I would hope they would refrigerate it.
18 Q Okay. And how about the word "fresh"? What makes
19 something fresh?
20 A That it's not been sitting around and getting
21 moldy and stale.
22 Q Did you read the phrase that the ingredients are
23 delivered fresh or raw before you purposed the dog
24 food?
25 A Yes.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 74

1 Q Was this important to you?
2 A That it was fresh, yes.
3 Q Why?
4 A Because I don't want to feed my -- I mean, if
5 we're buying bags that are sealed so that there's
6 no air in it, we're concerned that other things
7 can get in it.
8 Q Okay. So continuing on the front of the bag,
9 let's direct our attention now to a logo on the
10 right that says "FD." Do you see that?
11 A FD?
12 Q A little bit higher. Right there.
13 A Okay. I don't see FD anywhere.
14 MS. PETERSON: Yeah, I don't see
15 that.
16 Q It's a black icon on the right in a hexagon-type
17 shape.
18 A These guys here?
19 Q Yes.
20 A Okay. Okay.
21 Q All right. So I'm going to read underneath it.
22 It says, "Freeze dried tripe infused for natural
23 flavor."
24 Did I read that correctly?
25 A Yes.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 75

1 Q And do you recall seeing on the bag that freezing
2 processes were used in the making of this dog
3 food?
4 A I do not recall that, no.
5 Q Okay. Would the fact that freezing was used,
6 would that be a problem for you?
7 A Wouldn't be a problem for me, no.
8 Q Okay. I'm going to introduce another exhibit.
9 It's going to be the other dog food. So this will
10 be Exhibit 5.
11 (Exhibit No. 5 marked for
12 identification.)
13 Q Here you go, Mr. --
14 MS. PETERSON: I just want to see
15 what exhibit number this is. Sorry. I just
16 want to mark these for myself.
17 Q Does this look like the bags you purchased for
18 your dogs?
19 A Yep.
20 Q Can you please turn your attention to the second
21 page, which is an image of the back of the bag.
22 If you can direct your attention about
23 three-fourths of the way down, you'll see some
24 little cartoon images of different fish. Do you
25 see where I'm pointing to?

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 76

1 A Yes.
2 Q Okay. And I'm going to read a phrase. It says,
3 "This 13-pound package of Orijen is made with over
4 11 pounds of fresh, raw, or dehydrated fish
5 ingredients." Did I read that correctly?
6 A Yes.
7 Q And does the -- the word "raw" mean anything
8 different in the context of fish to you?
9 A No.
10 Q Okay. Does Champion represent anywhere that a
11 hundred percent of its ingredients are fresh?
12 MS. PETERSON: Objection, calls for
13 speculation.
14 A It doesn't say that, no.
15 Q Okay. Does it say anywhere that a hundred percent
16 of these ingredients are raw?
17 A It does not say that a hundred percent of the
18 ingredients are raw.
19 Q Okay. So now let's move our -- our attention a
20 little bit lower down on the bottom left little
21 square. It says, "Whole prey diet." Do you see
22 that?
23 A Yes.
24 Q And underneath that, it says, "Fish, organs, and
25 cartilage." Did I read that correctly?

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 77</p> <p>1 A Yep.</p> <p>2 Q Did you review the concept of whole prey? Did you</p> <p>3 see that before you purchased the dog food?</p> <p>4 A I wouldn't have gotten that precise, no. I looked</p> <p>5 at things like "biologically appropriate dog food"</p> <p>6 and that it's fresh and, I mean, all the little</p> <p>7 niche words, "kitchens." So I think of a person</p> <p>8 with a little chef's hat on in a kitchen, not --</p> <p>9 not a factory slopping whatever through it. So --</p> <p>10 Q Do you have any reason to think that the food or</p> <p>11 the ingredients to make the Orijen food were not</p> <p>12 fresh?</p> <p>13 A Do I have? No. It's telling me that everything</p> <p>14 is fresh.</p> <p>15 Q Do you believe otherwise?</p> <p>16 A I didn't believe otherwise, no.</p> <p>17 Q How about now after your experience purchasing</p> <p>18 it --</p> <p>19 A Yes.</p> <p>20 Q -- for ten years?</p> <p>21 A Now even after listening to you talk about</p> <p>22 13 pounds and 11 pounds of fresh -- okay. In my</p> <p>23 mind, what's the other two pounds? You know,</p> <p>24 so --</p> <p>25 Q So why don't you think the food is fresh?</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 79</p> <p>1 trusted them.</p> <p>2 Q Do you believe otherwise at this moment?</p> <p>3 A At this moment, yes.</p> <p>4 Q Why?</p> <p>5 A Because I feel that it created the cancer that</p> <p>6 killed my two dogs.</p> <p>7 Q Do you have any reason to believe it created the</p> <p>8 cancer other than your own gut opinion?</p> <p>9 A I have not got actual medical proof, no.</p> <p>10 Q Okay. I'm going to introduce an exhibit, 6.</p> <p>11 (<u>Exhibit No. 6</u> marked for</p> <p>12 identification.)</p> <p>13 Q Does this look like another iteration of the</p> <p>14 Six Fish diets that you purchased?</p> <p>15 A Yes.</p> <p>16 Q Okay. So I'd like to -- where's my -- did I --</p> <p>17 MS. PETERSON: <u>Exhibit 6</u>? Is that</p> <p>18 what's on the --</p> <p>19 MS. BACA: Did I accidentally give</p> <p>20 you my copy? It's marked at the --</p> <p>21 MS. PETERSON: Oh, yeah. Did she</p> <p>22 give you two?</p> <p>23 THE WITNESS: No.</p> <p>24 MS. PETERSON: If you need this,</p> <p>25 you can have it. I just -- I can share with</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 78</p> <p>1 A Because it's -- first of all, you've got two</p> <p>2 pounds of something that's not fresh in there, and</p> <p>3 I didn't even notice that on the package before.</p> <p>4 Q Okay.</p> <p>5 MS. PETERSON: Objection to the</p> <p>6 point also that Six Fish pack -- packaging</p> <p>7 changed throughout the years, and he bought</p> <p>8 the pet food for over ten years. So this may</p> <p>9 not be the exact package that he saw when</p> <p>10 purchasing the food.</p> <p>11 THE WITNESS: That is true, because</p> <p>12 this is more of an updated package. I'm sure</p> <p>13 it is.</p> <p>14 Q Okay. Let's turn to the front of this bag. Right</p> <p>15 in the dead middle, it says, "Biologically</p> <p>16 appropriate." How do you define biologically</p> <p>17 appropriate?</p> <p>18 A Means that it's good, healthy food for my dogs.</p> <p>19 It's made with only six fish. I was told that</p> <p>20 there are specific times of the year that they</p> <p>21 can't even get all six fish, so they stop</p> <p>22 producing it.</p> <p>23 Q Is there any reason for you to think that the food</p> <p>24 is not biologically appropriate?</p> <p>25 A No, because it's telling me that it is, and I</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 80</p> <p>1 him, but I did already write "6" on the</p> <p>2 corner.</p> <p>3 MS. BACA: That's all right. I'll</p> <p>4 give it back to you. I'm sorry. I must have</p> <p>5 lost my copy.</p> <p>6 Q Okay. I'd like to correct your attention to the</p> <p>7 second page, please. At the very top, it says,</p> <p>8 "Biologically appropriate food." Do you see that?</p> <p>9 A Yes.</p> <p>10 Q And does it say, "Here at Champion, our mission is</p> <p>11 clear and strong. We make biologically</p> <p>12 appropriate dog and cat foods."</p> <p>13 Did I read that correctly?</p> <p>14 A That's what it says.</p> <p>15 Q Okay. Is there any reason to think that this</p> <p>16 mission was not accomplished at Champion dog food?</p> <p>17 A Since the death of my two dogs, in my opinion,</p> <p>18 there is.</p> <p>19 Q Okay.</p> <p>20 A And this the actual back of the package? I would</p> <p>21 have never -- never read that much information in</p> <p>22 my life. So --</p> <p>23 Q Okay. Let's go back to what was marked as</p> <p>24 <u>Exhibit 4</u>, which is the Regional Red. And let's</p> <p>25 go back to the five little icon logos on the --</p>

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 81</p> <p>1 A Yes.</p> <p>2 Q -- bottom. Do you see the one all the way on the</p> <p>3 far left that says "BA"?</p> <p>4 A Yes.</p> <p>5 Q And underneath it, it says, "Biologically</p> <p>6 appropriate. Protein-rich, carbohydrate limited."</p> <p>7 Did I read that correctly?</p> <p>8 A Yes.</p> <p>9 Q And did you review this phrase before purchasing?</p> <p>10 A I would say, no, I didn't get into that fine</p> <p>11 print, no.</p> <p>12 Q Was food that was high in protein and low in carb</p> <p>13 something that you were interested in purchasing?</p> <p>14 A We looked for protein. Carbs doesn't bother me.</p> <p>15 "Biologically appropriate" is the click word that</p> <p>16 made me think that this is good, nutritional food.</p> <p>17 Q Okay. How about the ingredient panel on the</p> <p>18 second page? Did you also review the ingredients</p> <p>19 before you bought the food?</p> <p>20 A I reviewed it, but I wouldn't have -- no, you -- I</p> <p>21 don't -- any chemical names -- this don't have any</p> <p>22 chemicals in it. So I don't know -- you know, I</p> <p>23 reviewed the ingredients, yes.</p> <p>24 Q Sorry. Can you clarify. What doesn't have</p> <p>25 chemicals in it?</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 83</p> <p>1 A When it's made within a certain geographical</p> <p>2 region, and the product or ingredients are sourced</p> <p>3 regionally.</p> <p>4 Q Is New England regional to you?</p> <p>5 A New England? Yes.</p> <p>6 MS. PETERSON: Just to clarify, are</p> <p>7 you saying to Wisconsin or to</p> <p>8 DogStar Kitchens?</p> <p>9 Q Okay. Let's ask both. Is New England regional to</p> <p>10 Wisconsin?</p> <p>11 A Regional to Wisconsin? No.</p> <p>12 Q Is it regional to Champion's DogStar Kitchen in</p> <p>13 Kentucky?</p> <p>14 A I would say, no, because it's -- Kentucky isn't in</p> <p>15 the same region as New England.</p> <p>16 Q And at your first gut, you did say that it was</p> <p>17 regional. Why did you think at first it was</p> <p>18 regional?</p> <p>19 A Because it's a region of the country.</p> <p>20 Q Okay. So does it meet your definition of</p> <p>21 regional?</p> <p>22 A It's a -- New England is a region of the country.</p> <p>23 Yes, my definition would be that it's a region of</p> <p>24 the country.</p> <p>25 Q Okay. Let's read a sentence on the front of this</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 82</p> <p>1 A Well, I guess I -- the way food is nowadays and</p> <p>2 pet food, they have other things that are in the</p> <p>3 mix that I don't understand how they get in there.</p> <p>4 So if this is exactly what's in the bag, that's</p> <p>5 what you're telling me is exactly in the bag.</p> <p>6 Q Can you please clarify whether you read the</p> <p>7 ingredient panel before purchasing the food?</p> <p>8 A I wouldn't have read it totally, no.</p> <p>9 Q Okay. And I -- I know I asked you earlier, but</p> <p>10 you said -- to confirm, you're not aware of the</p> <p>11 American Association of Feed Control Officials,</p> <p>12 which stands for the AAFCO?</p> <p>13 A No. I don't know who that is. Never heard of it.</p> <p>14 Q Are you familiar with any definitions or defined</p> <p>15 terms for ingredients or on packaging?</p> <p>16 A No.</p> <p>17 Q Okay. Did you read below the ingredient panel the</p> <p>18 guaranteed analysis discussing the percentages of</p> <p>19 fat and protein?</p> <p>20 A We would have looked at that, yes.</p> <p>21 Q And how about underneath that, caloric content?</p> <p>22 A Probably not getting down into that.</p> <p>23 Q Okay. So let's go back to <u>Exhibit 5</u>, which is the</p> <p>24 Six Fish. What does the phrase -- when is</p> <p>25 something regional?</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 84</p> <p>1 bag. It's in a -- a black area underneath this</p> <p>2 red rectangle. It says, "New England's vast</p> <p>3 Atlantic waters are source of inspirational -- or</p> <p>4 a source of inspiration, excuse me, and fresh,</p> <p>5 regional fish."</p> <p>6 A Okay.</p> <p>7 Q Did you read that before you bought the bag?</p> <p>8 A We knew that it was sourced in New England and the</p> <p>9 fish were from that area, yes.</p> <p>10 Q And did you take issue with the fact that it was</p> <p>11 sourced in New England?</p> <p>12 A No.</p> <p>13 Q Did you like that it was sourced in New England?</p> <p>14 A Yes.</p> <p>15 Q Why?</p> <p>16 A Because it's fresh. That's where the fish are.</p> <p>17 If they came to me and said, "We sourced our fish</p> <p>18 in Kentucky next to our kitchen," I would say,</p> <p>19 "You got carp or something in there. You don't</p> <p>20 have fresh New England fish."</p> <p>21 Q That makes sense. Is the Atlantic, in your</p> <p>22 opinion, the most regional ocean to the Kentucky</p> <p>23 kitchen?</p> <p>24 A I suppose it would be. It's closest.</p> <p>25 Q Okay. So let's turn to the back of the bag. On</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 85

1 the top right-hand side, you're going to see three
2 little icons, and I'm looking for one that kind of
3 looks like a little house.
4 A Okay.
5 Q Underneath it, it says, "Never outsourced." Do
6 you see where I'm looking at?
7 A Yes.
8 Q Okay. I'm going to read a sentence now. It says,
9 "Prepared exclusively in our DogStar Kitchens. We
10 don't make foods for other companies, and we don't
11 allow our foods to be made by anyone else."
12 Did I read that correctly?
13 A You read it correctly.
14 Q Did you review this area of the bag before you
15 bought the food?
16 A Probably not.
17 Q Okay. And what does the concept of "never
18 outsourced" mean to you?
19 A It means that they make it themselves, and they
20 don't make it -- have somebody else make it for
21 them in a big mill somewhere.
22 Q Do you think this phrase applies to the finished
23 food product?
24 A Yes.
25 Q Is the fact that the food is not outsourced

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 86

1 important to you?
2 A I want the people that say they're producing it
3 produce it, yes.
4 Q Do you have any reason to believe that Champion
5 did outsource its food product?
6 A I have no idea. Doesn't say that on their
7 packaging.
8 Q Okay. Let's move now to -- a little bit to the
9 left. I'm looking at the last sentence of a
10 larger paragraph here on the top.
11 A Okay.
12 Q And it says that, "Prepared exclusively in our
13 Kentucky DogStar Kitchens. Award-winning Orijen
14 is guaranteed to keep your dog healthy, happy, and
15 strong." Did you review that before purposing?
16 A I'm sure I would have read that.
17 Q And does "happy, healthy, strong" mean something
18 to you, or is it important to you at all?
19 A Of course.
20 Q So let's go down now to the very bottom. It's
21 going to be to the right of that whole price
22 section we already talked about.
23 A Okay.
24 Q And it's a little rectangle here that starts with
25 a logo, RF.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 87

1 A Yep.
2 Q So I'm going to read a sentence now. It says,
3 "Orijen features fresh, raw, or dehydrated fish
4 ingredients minimally processed at lower
5 temperatures from wild-caught fish that are deemed
6 fit for human consumption prior to inclusion in
7 our foods." Did I read that correctly?
8 A Yes.
9 Q Did you read that paragraph before you purchased
10 the dog food?
11 A I would have probably read the bigger lettering,
12 maybe not down to that smaller print.
13 Q Okay. Is Champion -- had Champion anywhere
14 implied that its finished kibble is fit for humans
15 to eat?
16 MS. PETERSON: Objection. Not at
17 issue in this case.
18 A If I would have read this, it says, "Fit for --
19 deemed fit for human consumption." It doesn't say
20 finished -- correct.
21 Q It's talking about the fish; is that what you're
22 saying?
23 A Correct, but your still looking at and it saying,
24 "Geez, this is good stuff. It's fit for humans."
25 Q Does the bag -- now that I think we've gone over a

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 88

1 lot of square footage of this bag, is the bag
2 saying anywhere that the food is heavy metal-free?
3 A I don't see that on here, no.
4 Q Is the bag saying anywhere that it's BPA-free?
5 A No.
6 Q Does the bag anywhere say that it is toxin-free?
7 A No.
8 Q Okay.
9 A In my opinion, fresh sourced product wouldn't have
10 all that stuff in it, but I'm not a biologist.
11 Q Are you aware that heavy metals occur naturally in
12 our environment?
13 A Yes.
14 Q And how did you learn that?
15 A Just -- I don't know. Reading it somewhere.
16 Q So if you agree that heavy metals occur naturally,
17 is your -- is it your opinion that Champion's food
18 is still natural?
19 A I thought it was natural, and that's the way I --
20 that's why we bought this product for our dogs.
21 Q In your lawsuit, are you saying that Champion has
22 added metals to its dog food?
23 A I guess my whole thing is that if a producer is
24 saying that it's biologically sourced and that
25 it's appropriate for my dog, that they would have

Videotaped Deposition of SCOTT WEAVER, 6-19-19	Videotaped Deposition of SCOTT WEAVER, 6-19-19
<p>Page 89</p> <p>1 done testing to prove that it's not in there. I'm</p> <p>2 not saying that -- you know, all I know is if it's</p> <p>3 in there, I'm not saying that somebody</p> <p>4 intentionally did it, but they should have done</p> <p>5 testing to say, "Whoa, wait a minute. We can't</p> <p>6 put this in there. This has got this -- a level</p> <p>7 of this in there," anything that shouldn't in</p> <p>8 there.</p> <p>9 Q Are you aware that Champion does routine testing</p> <p>10 of their ingredients?</p> <p>11 A Oh, I would assume they would.</p> <p>12 Q Okay. In your opinion, is there a level or amount</p> <p>13 of the molecules of heavy metals that would be</p> <p>14 okay for your dog or still make the food</p> <p>15 biologically appropriate?</p> <p>16 A No.</p> <p>17 Q Why not, if you think it's naturally occurring?</p> <p>18 A I'm going to go back to that same commercial that</p> <p>19 I said before on the water. I mean, if you tell</p> <p>20 somebody that it's got lead in it, they're not</p> <p>21 going to drink it. They're going to say, "I don't</p> <p>22 want water with lead in it."</p> <p>23 If you told me, "Here, have this can of</p> <p>24 Diet Coke, but it's got heavy metals in it," it</p> <p>25 might only have two pieces or it might have 50.</p>	<p>Page 91</p> <p>1 part per billion of BPA in the food?</p> <p>2 A Correct.</p> <p>3 Q And is it your position that there should be not</p> <p>4 even one molecule of heavy metals in your food?</p> <p>5 A Correct.</p> <p>6 Q And when I say "heavy metals," I want to make sure</p> <p>7 that you and I are on the same page. I'm talking</p> <p>8 about the four that are at issue in the complaint,</p> <p>9 which are arsenic, cadmium, and lead. Is that</p> <p>10 your understanding --</p> <p>11 A Yes.</p> <p>12 Q -- as you answer these questions?</p> <p>13 A Yes.</p> <p>14 Q Thank you. Are you aware of any scientific</p> <p>15 guidelines or standards for heavy metals in dog</p> <p>16 food?</p> <p>17 A No.</p> <p>18 Q Have you read any European Union standards</p> <p>19 regarding heavy metals in dog food?</p> <p>20 A I thought in one of these documents, it mentioned</p> <p>21 European something in it, but other than that, no.</p> <p>22 Q That's correct. It is in your complaint.</p> <p>23 What is your goal by bringing this lawsuit?</p> <p>24 What do you hope Champion will do?</p> <p>25 A Be honest with the consumers and state what's in</p>
<p>Page 90</p> <p>1 Are you going to drink it? No. I'd switch to</p> <p>2 Pepsi, even though I hate Pepsi.</p> <p>3 Q But what if Pepsi also had lead in it?</p> <p>4 A Then I would say be silly and drink water like my</p> <p>5 wife wants me to.</p> <p>6 Q So is it your understanding that Champion's adding</p> <p>7 BPA to its food?</p> <p>8 A Like I said before, I'm not saying that anybody is</p> <p>9 adding it, but if they did testing and it was</p> <p>10 sourced and found in it, they should have</p> <p>11 logically said, "How can I get this out of this</p> <p>12 food," not just let it go through the line.</p> <p>13 Q How do you think the BPA gets in there? What's</p> <p>14 your understanding?</p> <p>15 MS. PETERSON: Objection, calls for</p> <p>16 speculation and expert opinion.</p> <p>17 A I have no idea how their -- what their facility</p> <p>18 looks like. In my opinion from reading this, it's</p> <p>19 a sanitary Kentucky kitchen with little chefs</p> <p>20 preparing my dog's food.</p> <p>21 Q In your opinion, would there be a level or amount</p> <p>22 of BPA molecules that would still make the food</p> <p>23 biologically appropriate?</p> <p>24 A No.</p> <p>25 Q Is your position that there should be not even one</p>	<p>Page 92</p> <p>1 the product --</p> <p>2 Q How would --</p> <p>3 A -- correctly.</p> <p>4 Q -- they do that?</p> <p>5 A Well, put a stamp on that says, "May contain heavy</p> <p>6 metals. May contain BPA. May contain this." Let</p> <p>7 the consumer look at it and say, (descriptive</p> <p>8 noise), I'm not buying it."</p> <p>9 Q If the disclosure were on the Champion's</p> <p>10 packaging, would that have made a difference to</p> <p>11 you?</p> <p>12 A It would have to be placed in a logical spot.</p> <p>13 More than likely they would have put it in small</p> <p>14 print in the back corner where somebody would look</p> <p>15 at it and go, "Oh, I didn't read that." That's</p> <p>16 the way people do it.</p> <p>17 Q When did you first become aware that Champion pet</p> <p>18 food might contain pentobarbital?</p> <p>19 A When we started discussing the case with our</p> <p>20 counsel.</p> <p>21 Q You don't need to tell me what you discussed with</p> <p>22 counsel. Okay?</p> <p>23 Why do you think pentobarbital is bad for</p> <p>24 your dog?</p> <p>25 A Because it's not an appropriate biologically thing</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 93	Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 95
<p>1 for my dogs or for me as a person; and again, I</p> <p>2 feed my dogs what we think is the best.</p> <p>3 Q Is it your understanding that pentobarbital is</p> <p>4 present in every Champion pet food diet?</p> <p>5 A I haven't -- I have no information about all your</p> <p>6 other pet food. I'm only concerned about the two</p> <p>7 that I fed my dogs.</p> <p>8 Q Do you believe that pentobarbital was in the</p> <p>9 Six Fish and the Regional Red?</p> <p>10 A Yes.</p> <p>11 Q What are your views on the FDA?</p> <p>12 A The FDA? I would say the FDA is --</p> <p>13 MS. PETERSON: Objection,</p> <p>14 relevancy, but go ahead.</p> <p>15 A I would say the FDA is a good body that should be</p> <p>16 sourcing -- or -- identifying problem areas.</p> <p>17 Q If the FDA made a decision that a food doesn't</p> <p>18 need to be recalled, would you trust that</p> <p>19 decision?</p> <p>20 A If the DFA says it doesn't need to be recalled?</p> <p>21 No, probably not. I would want to do more check</p> <p>22 into it.</p> <p>23 Q What additional checking into it would you do?</p> <p>24 A I would probably go on the internet, start</p> <p>25 sourcing and seeing what other people are saying</p>		<p>1 A The squeaker would be plastic, but it's inside the</p> <p>2 toy, and if the toy is compromised, they get</p> <p>3 thrown in the trash.</p> <p>4 Q What is the outside of the toy that has the</p> <p>5 squeaker in it?</p> <p>6 A Cloth and rope. Firehose-type rope. We don't --</p> <p>7 we don't do rawhide. We don't do rubber, things</p> <p>8 like that.</p> <p>9 Q So your dog bowl is made out of stainless steel?</p> <p>10 A Correct.</p> <p>11 Q What is your scooper?</p> <p>12 A Stainless steel.</p> <p>13 Q Okay.</p> <p>14 A And they get washed regularly, as I mentioned</p> <p>15 earlier.</p> <p>16 MS. BACA: Okay. Let's take a</p> <p>17 break, if you don't mind. Is that all right?</p> <p>18 MS. PETERSON: Sure. Five minutes?</p> <p>19 MS. BACA: Yeah.</p> <p>20 THE VIDEOGRAPHER: Going off the</p> <p>21 record at 10:12.</p> <p>22 (Recess taken.)</p> <p>23 THE VIDEOGRAPHER: We're back on</p> <p>24 the record at 10:22.</p> <p>25 Q Mr. Weaver, could you explain -- or you got</p>	
Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 94	Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 96
<p>1 about it.</p> <p>2 Q Whose opinion would you value over the FDA?</p> <p>3 A Other organizations, professionals. I would want</p> <p>4 to see what people say.</p> <p>5 Q Could you name some organizations?</p> <p>6 A No.</p> <p>7 Q Could you name some professionals?</p> <p>8 A No.</p> <p>9 Q If a highly sophisticated instrument could not</p> <p>10 detect the presence of the pentobarbital, would</p> <p>11 you think that that food is safe?</p> <p>12 MS. PETERSON: Objection.</p> <p>13 A If they told me it wasn't in there, then I would</p> <p>14 agree with them, but I don't know what a highly</p> <p>15 sensitive instrument is, no.</p> <p>16 Q Do your dogs have any chew toys?</p> <p>17 A Chew toys? Yes.</p> <p>18 Q What are they made out of?</p> <p>19 MS. PETERSON: Objection,</p> <p>20 relevancy.</p> <p>21 Go ahead and answer.</p> <p>22 A I would say if you looked at them, they're -- the</p> <p>23 majority of them are made out of rope or material</p> <p>24 with squeakers inside them.</p> <p>25 Q Is that material plastic?</p>		<p>1 confirmation while we were on break. Could you</p> <p>2 please tell us the date that Jill passed.</p> <p>3 A Jill passed on April 30th at 1:45 in the morning.</p> <p>4 Jack passed at -- on May 24th at 1:00 in the</p> <p>5 afternoon.</p> <p>6 Q Did you switch off of -- your dogs off of Orijen</p> <p>7 after the April death of your dog?</p> <p>8 A That's what I believe was the date, was April or</p> <p>9 May.</p> <p>10 Q I know I asked you the names of some of your</p> <p>11 veterinarians, but could you provide me with the</p> <p>12 name of the ER hospital that you took Jill to that</p> <p>13 night?</p> <p>14 A I think it's called Emergency -- ER. It's on the</p> <p>15 Beltline here.</p> <p>16 Q If you could tell us where it's located, that</p> <p>17 would be helpful.</p> <p>18 MS. PETERSON: We can provide that</p> <p>19 to you later --</p> <p>20 THE WITNESS: Yeah.</p> <p>21 MS. PETERSON: -- so he doesn't</p> <p>22 have to sit on Google. The address, that is.</p> <p>23 MS. BACA: Thank you.</p> <p>24 A It's a brand -- well, now it's brand new. It was</p> <p>25 an old facility. It's been there for 40 years,</p>	

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 97

1 but they just built this beautiful,
2 state-of-the-art facility.
3 Q Were there ever any indications in Jill that she
4 had elevated levels of lead in her blood?
5 A No.
6 Q Were there any indications she had elevated levels
7 of mercury in her blood?
8 A No.
9 MS. PETERSON: Objection, calls for
10 an expert opinion, but go ahead and answer.
11 Q Have you gotten any --
12 A We never got tested, no.
13 Q Have you done blood work on -- on Jill?
14 A Oh, yeah. They've had blood work, but I don't
15 know if they get it down to metals or anything
16 like that.
17 Q Did you do any biopsies of tissues or anything
18 that might have looked at heavy metals?
19 A No.
20 Q How about for Jack? Were there any blood work
21 done that might have shown that he had elevated
22 levels of --
23 A I don't recall seeing anything with elevated
24 levels of metals.
25 Q Metals? And how about Jack's biopsies or tissue

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 98

1 samples?
2 A No. They had blood work done, but typically it's
3 for, you know, whatever they look for, markers.
4 Q Have you done additional blood work, testing for
5 Prince Harry after his two siblings passed?
6 A No, but that's a good point. Maybe we should do
7 that.
8 Q How would you describe Prince Harry's health?
9 A Very healthy, 80 pounds, beautiful dog.
10 Q Have you recently taken Prince Harry to the vet?
11 A He does his normal checkups, yes.
12 Q Is it an annual checkup?
13 A Yes.
14 Q Earlier you told me that you would not feed your
15 dogs raw food. Why not?
16 A One, I just -- we just have always looked at
17 it -- even we were just at the Mounds store the
18 other day, and they had the -- the refrigerator or
19 whatever with the raw, and we both looked at it
20 and go, "That's just disgusting, you know, having
21 those raw bones, even," and they had bones with
22 infused -- whatever they put inside them. No.
23 No, I would never do that.
24 Q So in your mind, the only alternative was dry
25 kibble?

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 99

1 A Yes. Well, you can do canned food, but I'm not
2 into cans.
3 Q Why did you choose not to do canned food?
4 A Probably cost looking at and it just -- the
5 kibble -- do you have dogs?
6 Q I had a dog that passed?
7 A Okay. Kibble -- when you get good kibble and
8 they're eating it, when you're picking up after
9 three dogs in the backyard, it's good to pick up
10 firm pickups, not mushy from the canned moist --
11 it's totally different.
12 Q Understood.
13 A And we -- we're pet people. So even doing picking
14 up, we pick up -- we have biodegradable bags that
15 we pick up. I've got a metal can in the backyard
16 that we put it in, and then we throw it away each
17 week. And when we pick it up, we always pick up
18 and go, "Oh, it looks good. Oh, this one doesn't
19 look good. It's kind of slimy." We know those
20 things to look for. So --
21 Q While your dogs were consuming Orijen, did you
22 feel like they're -- their fecal was okay?
23 A Yep.
24 Q And by "okay," I mean firm.
25 A Firm, yeah.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 100

1 Q Nothing out of the ordinary? Did Jill or Jack
2 have any other illnesses before they passed before
3 their final --
4 A No.
5 Q Okay.
6 A And they had -- even to the point of because of --
7 they're therapy dogs, they all get their eyes
8 tested. It's a free service, and that's -- at the
9 vet, the ER vet. They have a specialist that
10 comes in and checks all the therapy dogs in
11 Madison for their eyes. So they would go in for
12 that as well.
13 Q Is Prince Harry doing that too?
14 A Yes.
15 Q You said his health now is healthy, but has he
16 always been a healthy --
17 A Always.
18 Q -- dog?
19 A Yep.
20 Q Okay. I'm going to enter another exhibit. This
21 will be Exhibit 7.
22 (Exhibit No. 7 marked for
23 identification.)
24 Q Does this look like the bag that you are
25 purchasing now for Prince Harry?

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 101</p> <p>1 A Yes.</p> <p>2 MS. PETERSON: I'm going to object</p> <p>3 to this line of questioning for relevancy,</p> <p>4 but you can go ahead and answer.</p> <p>5 Q Did you review the ingredient panel that's on the</p> <p>6 second page of this document before you purchased</p> <p>7 the dog food?</p> <p>8 A Probably the same as we did for the first one,</p> <p>9 yes.</p> <p>10 Q Do these ingredients look like the ingredients</p> <p>11 that are in Prince Harry's food right now?</p> <p>12 A I'm taking you at your word.</p> <p>13 Q Okay.</p> <p>14 A I don't have the bag in front of me.</p> <p>15 Q Were you aware -- or are you aware that Champion</p> <p>16 has two facilities where they produce their dog</p> <p>17 food; one in Canada and one in Kentucky?</p> <p>18 A I was under the understanding that Canada was not</p> <p>19 producing anymore, that it was moved to -- to the</p> <p>20 United States.</p> <p>21 Q To see if I understand you correctly, is it your</p> <p>22 understanding that the food that Champion is</p> <p>23 circulating now within the U.S. is only made in</p> <p>24 Kentucky?</p> <p>25 A In my understanding, correct.</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 103</p> <p>1 Q Okay. Earlier, you mentioned that you hoped that</p> <p>2 Champion could put a disclosure on its bag. What</p> <p>3 would you want it to say?</p> <p>4 A I'm just saying that you should talk about</p> <p>5 testing, and if -- if you guys find any product</p> <p>6 that's manmade, environmental in your food that's</p> <p>7 not good for an animal and you state that it's fit</p> <p>8 for human consumption, well, you certainly</p> <p>9 wouldn't be putting it in human food. So that's</p> <p>10 my whole feeling on it. I mean, be -- be upfront</p> <p>11 and truthful, but first of all, don't -- if you</p> <p>12 test, which you said they test regularly, and you</p> <p>13 find it, find out what the source is and eliminate</p> <p>14 the source so that it's not in there.</p> <p>15 Q Is it your understanding that human foods don't</p> <p>16 have heavy metals or other contaminants?</p> <p>17 A That's my understanding.</p> <p>18 Q Human -- all types of human food?</p> <p>19 A I'm not saying -- I'm not saying all. I -- I</p> <p>20 don't know of any heavy metal in food. You know,</p> <p>21 or -- or water, whatever.</p> <p>22 Q You mentioned lead in water?</p> <p>23 A From that commercial that I saw on TV.</p> <p>24 Q Do you think --</p> <p>25 A Which is --</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 102</p> <p>1 Q Okay.</p> <p>2 A And they -- they stopped doing the vacuum sealing.</p> <p>3 Q When did you become aware that the dog food being</p> <p>4 sold in the U.S. moved from being produced in</p> <p>5 Canada to -- to Kentucky?</p> <p>6 A I couldn't tell you the exact date.</p> <p>7 Q Did you become aware of a difference in the</p> <p>8 sealing of the bags during the time that you were</p> <p>9 purchasing the Orijen?</p> <p>10 A Yes. They stopped doing the vac sealing.</p> <p>11 Q Around when? Do you remember?</p> <p>12 A No, I don't recall. Just a couple years ago. I</p> <p>13 don't know.</p> <p>14 Q If I could ballpark it, do you feel like you went</p> <p>15 through a few years of purchasing where it wasn't</p> <p>16 vacuum sealed?</p> <p>17 A I would say a few years.</p> <p>18 Q Okay. Did the fact that it was no longer vacuum</p> <p>19 sealed affect your purchasing decision or</p> <p>20 anything?</p> <p>21 A A little. A little, but she was set on that food.</p> <p>22 So we didn't want to make a change.</p> <p>23 Q Okay.</p> <p>24 A I don't -- honestly, I don't think there's another</p> <p>25 pet food in the store that's vac sealed like that.</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 104</p> <p>1 Q -- the commercial's fake?</p> <p>2 A Do I think the commercial's fake? No. No. And</p> <p>3 I'll be honest with you, in Madison, they have</p> <p>4 wells that they have to shut down because they</p> <p>5 have things that are in the wells. So they shut</p> <p>6 them down when it's in there, or they tell people</p> <p>7 in the community, you know, to boil your water or</p> <p>8 silly things like, when we go out to dinner, if</p> <p>9 we're eating in Madison and we have water, we</p> <p>10 asked for lemons because lemons will help -- the</p> <p>11 acid in the lemon will help clean out the water.</p> <p>12 Q At what point do you think that an advisory goes</p> <p>13 out that says, "Boil your water, or the water is</p> <p>14 no longer safe"?</p> <p>15 A When it's contaminated.</p> <p>16 Q And at what point does something become</p> <p>17 contaminated?</p> <p>18 A When --</p> <p>19 MS. PETERSON: Objection, calls for</p> <p>20 expert opinion.</p> <p>21 A When people -- in my opinion when people start</p> <p>22 getting sick and they have problems.</p> <p>23 Q Do you think that --</p> <p>24 A Kind of like in Michigan with the problem with the</p> <p>25 lead that was in the water. Flint, I guess that</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 105

1 was.
2 Q Does just one molecule of a substance make
3 something --
4 A I don't know what the level is. I'm not a
5 biologist.
6 Q Okay. How did you first learn about the issues of
7 heavy metals in the dog food? When did it first
8 come to your attention?
9 A When --
10 MS. PETERSON: Objection, asked and
11 answered.
12 A Before. We've answered that a couple times.
13 So --
14 Q Okay. When did you first learn about BPA?
15 A The same.
16 Q And what's the same?
17 A Same answer as we answered before. When --
18 Q Could you repeat it for me.
19 A When we sourced -- after we started checking to
20 see if there was a problem with the dog food and
21 we ended up --
22 Q Finding Ms. Peterson?
23 A Yes.
24 Q Could you give me about a month or a year around
25 the time that was?

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 106

1 A I would probably say it was maybe January-ish when
2 Jack was diagnosed with cancer.
3 Q January of what year?
4 A Last year, 2018.
5 MS. PETERSON: I will put on record
6 it was April of 2018.
7 THE WITNESS: April?
8 MS. BACA: Thank you.
9 MR. COULSON: What was April?
10 MS. PETERSON: When he first
11 contacted us.
12 MR. COULSON: When was Jack
13 diagnosed with --
14 THE WITNESS: January.
15 Q Jack was diagnosed in January of 2018 and passed
16 in May of 2018?
17 A Correct.
18 Q Okay. Was Ms. Peterson the first lawyer that you
19 reached out to?
20 A Yes.
21 Q And when was the first time you met or spoke with
22 her?
23 A I couldn't give you the exact date.
24 Q Okay. And I assume you have an agreement that you
25 have signed with her to hire her as your counsel?

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 107

1 A Yes. I've never hired an attorney in my life
2 other than this, ever.
3 Q Do you recall that the second amended complaint
4 has some test results in a chart within it?
5 A If you say so, yes.
6 Q Okay. Let's -- let's bring out the second amended
7 complaint, which is --
8 A The big one?
9 Q Yes, the big one. I am referring to pages 4
10 through 6.
11 A Okay.
12 Q Did you ever see the test results that formed this
13 chart?
14 A No, I don't think so. I haven't seen this.
15 Q Do you have any awareness of what lab came to
16 these conclusions?
17 A Other than if it's listed in here. I don't
18 recall.
19 Q Okay. Have you ever been charged with a crime
20 before?
21 A No.
22 Q Have you ever been a plaintiff in another lawsuit?
23 A No.
24 Q Have you ever been a defendant in another lawsuit?
25 A No.

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 108

1 Q Have you ever been in a bankruptcy suit?
2 A No.
3 Q A foreclosure?
4 A No.
5 Q How about small claims?
6 A We actually have a small claims right now.
7 Q Could you tell me about it.
8 A A gentleman was starting the -- a neighbor's car.
9 My wife and I were out in our backyard, and I was
10 hauling bark, putting it in my landscaping taking
11 a break, and I was sitting on our patio furniture,
12 and I looked up, and I saw the guy back out of
13 their driveway, and he backed right into my truck.
14 And he hit the truck so hard that the truck rocked
15 back and forth. I went, "Did he just hit that
16 truck?" The guy got out, looked at my car, and
17 drove away.
18 And I said, "Oh" -- and I got up, and I ran
19 over there, and I said to the little lady that
20 lives in the house, I said, "Who is the guy in the
21 red truck?" And she goes, "Oh, that's Marvin. He
22 does my starting for my car when it doesn't
23 start." I said, "Call Marvin. He just hit my
24 truck." And she goes, "Oh, okay. I'll call him,"
25 and then I called the police.

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 109</p> <p>1 And she told Marvin, "You better get back 2 here. The cops are coming." Well, they gave him 3 a ticket for hit and run and damage to property. 4 So then he kept telling me, "I'll fix it. I'll 5 pay first time. Get me an estimate." I said, 6 "Okay. I'll get an estimate." And I said, "I 7 know three shops that do reputable work. I'll get 8 the cheapest one for you, \$1,453," and Marvin 9 said, "No." He said, "Get me two more estimates." 10 I said, "Marvin, don't do this to me." I 11 said, "I don't have time to mess around with 12 this." I got two more estimates. I sent them to 13 him. He came back and said, "I can't do anything 14 until my court case is heard in Fitchburg," and I 15 said, "First of all, that doesn't have any bearing 16 on making restitution for the damage that you 17 agreed to pay in front of the police officer," and 18 he said, "No, I can't do it." 19 Well, then his past -- that date passed, and 20 I called him up, and I said, "Okay. Your court 21 date's passed." And he goes, "No, the City 22 attorney was out because she's on maternity 23 leave." So we got an extension. So I called the 24 City attorney, and I said, "Does one thing have 25 anything to do with the other?" And he goes,</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 111</p> <p>1 companies? 2 A No. 3 Q Have you ever been a class representative before? 4 A A what? 5 Q A class representative before. 6 A No. 7 Q This was your first time? 8 A Yes. 9 Q Do you know someone who has been a class 10 representative before? 11 A No. 12 Q How did you become aware that a class action is a 13 method that you could use? 14 A We just -- again, we've stated it several times 15 this morning that when we started looking into the 16 pet food, we saw this action. 17 Q Okay. 18 A And we contacted them. 19 Q Is that your extent with the legal field? 20 A Yeah. 21 Q Okay. 22 A My stepfather was an attorney. 23 Q Okay. 24 A But he passed 30 years ago. 25 Q Do you have any other lawyers in your family?</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 110</p> <p>1 "Absolutely not. He should make restitution. 2 That'll help in his case." 3 And I texted him and said, "Marvin, you need 4 to make restitution now before you go to your next 5 case so you can prove to them, 'Here, I settled up 6 with Mr. Weaver. I apologized, blah, blah, 7 blah.'" And he sent me back a few explic -- 8 explicit texts back and said, "I'm waiting until 9 the case -- the court case." 10 So then I said, "Fine. I'll start a small 11 claims action." So I started a small claims 12 action. And that's proceeding right now, and we 13 had to have it served to him like you do, and so 14 we went to the Dane County Police. They went and 15 served him, and I called the lady because I said, 16 "Can you tell me when you served him?" She said, 17 "8:52 in the morning today." I said, "Yeah, I got 18 a text at 8:58, "You" -- in capital letters, "You 19 are a dickhead." So that's my -- my extent of the 20 legal process. So now I'm waiting. 21 Q Have you hired a counsel to help in that? 22 A No. No, I wouldn't. 23 Q Have you been in any other small claims issues? 24 A No. 25 Q Have you been in any matters with insurance</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 112</p> <p>1 A No. 2 Q What do you understand your role to be in this 3 class action lawsuit? 4 A Providing information and following up on this 5 to -- to find out what happened so that it doesn't 6 happen to other people. 7 Q And do you understand that you are supposed to act 8 to represent people that are similarly situated as 9 you? 10 A Yes. 11 Q Do you feel like you have any duties towards the 12 other people in your class? 13 A Sure. I mean, it -- they're pet owners that loved 14 their pets. I'm a pet owner that loved my pet, 15 and if I can prevent someone else's heartache, I 16 would do it in a heartbeat. 17 Q What do you understand your claims to be against 18 Champion? 19 A I understand the claims to be that there's product 20 in here that shouldn't be in the food that causes 21 the problem that my dogs had. 22 Q And what are you asking for? 23 A I -- 24 MS. PETERSON: Objection, vague. 25 Q What are you hoping that the outcome of your</p>

<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 113</p> <p>1 lawsuit is?</p> <p>2 A I'm hoping that the outcome of my lawsuit is that</p> <p>3 they realize the wrong that they've done, and they</p> <p>4 correct the wrong that they've done and clearly</p> <p>5 label the package better. I mean, we've reviewed</p> <p>6 all of these packages, and all of them say</p> <p>7 "Biologically sourced, kitchens, this, that."</p> <p>8 This is all good stuff. Then prove it. Do it.</p> <p>9 And if you've -- if you tested it, and it's not,</p> <p>10 then fix it.</p> <p>11 Q How can you prove that it is?</p> <p>12 A Well, if they've done testing, prove that you have</p> <p>13 done testing, that there was nothing in it. If</p> <p>14 they're testing proves that there was, so be it.</p> <p>15 Fix it.</p> <p>16 Q How do you purport to fix it? Are you talking</p> <p>17 changing sourcing?</p> <p>18 A They have to change --</p> <p>19 MS. PETERSON: Objection.</p> <p>20 A They have to change how the -- either how they're</p> <p>21 sourcing or how they're testing the food before.</p> <p>22 They've got to do something.</p> <p>23 Q Do you believe Champion misled you into purchasing</p> <p>24 the dog good?</p> <p>25 A I believe after reading all of the advertising</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 115</p> <p>1 Q So before you had Jack, Jill, and Prince Harry,</p> <p>2 have you had other dogs?</p> <p>3 A Yes.</p> <p>4 Q How many other dogs?</p> <p>5 A Two other dogs that we had; Jesse, who was a</p> <p>6 golden retriever. Jesse lived to 19 -- 17 years</p> <p>7 old. We had Lady, who was a purebred</p> <p>8 Cocker Spaniel. I believe she was 15, and then I</p> <p>9 had a cat -- we had a cat, and our cat lived to</p> <p>10 22. Yeah. No, we -- we pamper our pets.</p> <p>11 Q What did you feed Jesse and Lady?</p> <p>12 A Jesse and Lady probably would have just gotten a</p> <p>13 regular, old dog food. That was when we were</p> <p>14 young and we had three small children, limited</p> <p>15 income. Now, my income has changed dramatically,</p> <p>16 and we spare nothing for our dogs. In fact, we're</p> <p>17 going on vacation to Mackinac Island, and it's a</p> <p>18 dog friendly resort, and we're taking the dogs</p> <p>19 with us. We take them everywhere.</p> <p>20 My -- I brought a brand New Jeep Grand</p> <p>21 Cherokee. My backseat has been lifted up once.</p> <p>22 It's folded down always. We have two blankets,</p> <p>23 and the dogs ride with us everywhere. I have</p> <p>24 drool all -- all over the windows and pet fur all</p> <p>25 over, even though I vacuum.</p>
<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 114</p> <p>1 that's on their package and what we've known about</p> <p>2 the product and now what we feel about the</p> <p>3 product, I believe that's correct.</p> <p>4 Q Have you been keeping track of what has happened</p> <p>5 in related lawsuits against Champion?</p> <p>6 A No.</p> <p>7 Q No? Are you aware of other lawsuits brought</p> <p>8 against other pet food manufacturers?</p> <p>9 A No. I don't --</p> <p>10 Q What do you do in this case to monitor what's</p> <p>11 going on? Is there anything you do in particular?</p> <p>12 A Just talk with Rebecca.</p> <p>13 Q Mm-hmm. Are you prepared to be responsible to</p> <p>14 cover court costs if that arises?</p> <p>15 A I would do whatever I needed to do.</p> <p>16 Q Have you talked to anyone about this lawsuit?</p> <p>17 A No.</p> <p>18 Q Outside of Rebecca?</p> <p>19 A No.</p> <p>20 Q How about your wife?</p> <p>21 A Oh, my wife, of course.</p> <p>22 Q Any other friends or family you've spoken to?</p> <p>23 A No.</p> <p>24 Q Anyone at the pet stores?</p> <p>25 A Nope.</p>	<p>Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 116</p> <p>1 Q Do you know the -- the cause of Jesse's death?</p> <p>2 A The cause? Nasal cancer. It had spread --</p> <p>3 MS. PETERSON: She said Jesse.</p> <p>4 A Oh, Jesse? No, Jesse, old age. 17, that's old.</p> <p>5 Q Do you know the cause of Lady's death?</p> <p>6 A I would say old age, 15.</p> <p>7 Q Okay. Do you currently have other dogs besides</p> <p>8 Prince Harry?</p> <p>9 A Right now we have Madison.</p> <p>10 Q And what breed is Madison?</p> <p>11 A A golden retriever.</p> <p>12 Q How old is Madison?</p> <p>13 A Madison is one year old.</p> <p>14 Q Did you just recently get Madison?</p> <p>15 A We got her one year ago -- well, one year less</p> <p>16 eight weeks.</p> <p>17 Q Did you get her from the same breeder?</p> <p>18 A No.</p> <p>19 Q Which breeder did you get her from?</p> <p>20 A We went to Nautilus out of Plymouth,</p> <p>21 Massachusetts.</p> <p>22 Q How did you hear about this new breeder?</p> <p>23 A My wife source -- sources breeders all the time.</p> <p>24 She loved goldens, and we've looked at all the</p> <p>25 breeders around here, found this one. Madison's</p>

Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 117	Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 119
<p>1 grandpa is the number one golden in the country, 2 and we paid dearly for her. Paid three times what 3 we paid for the other ones from the other breeder. 4 Q Is there a reason you didn't want to use the same 5 breeder? 6 A What's that? 7 Q Was there a reason you didn't want to use the same 8 breeder as the others? 9 A Just -- we just decided to use a different 10 breeder. 11 Q Okay. What is Madison eating? 12 A Same food. 13 Q The -- 14 A The Pro Plan. 15 Q Purina Pro Plan? And before that, do you recall? 16 A Puppy food. 17 Q Do you recall the brand of the puppy food? 18 A No. 19 Q I'm guessing it was -- I think it was Purina 20 Pro Plan Focus Puppy Food. In fact, it was. I 21 know it was. It's a much smaller kibble. 22 MS. BACA: Okay. Can we take a 23 break? 24 MS. PETERSON: Mm-hmm. 25 MS. BACA: All right. I think</p>		<p>1 that this comes on regularly? 2 MS. PETERSON: Objection, 3 relevance. 4 A Honestly, I don't -- I couldn't tell you what 5 channel it was on. It's just a commercial. And 6 it's actually -- I think it's for Brita or one of 7 those water companies, I think. I honestly 8 couldn't tell you. 9 Q Okay. 10 A I guess they didn't get their point across other 11 than the fact that lead is not good for anybody in 12 any type. 13 Q Okay. So you think that it's a -- a water filter 14 company's commercial? 15 A I think it was. 16 Q Okay. And this was -- you saw it two years ago, 17 or you've been seeing it regularly for the last 18 two years? 19 A I haven't seen it recently. So maybe they stopped 20 it. 21 Q Okay. All right. I want to bring out one more 22 bag that I did not introduce yet into -- this will 23 be <u>Exhibit 8</u>. 24 (<u>Exhibit No. 8</u> marked for 25 identification.)</p>	
Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 118	Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 120
<p>1 we're just about done. 2 MR. COULSON: Take a little bit 3 longer, at least ten minutes. We just want 4 to check notes and stuff, but we're 5 99 percent -- 6 MS. BACA: Like I said, we're done. 7 MR. COULSON: -- finished probably. 8 MS. PETERSON: Okay. I won't 9 even -- okay. So 10 minutes -- okay. 10 THE VIDEOGRAPHER: Going off the 11 record at 10:48. 12 (Recess taken.) 13 THE VIDEOGRAPHER: We're back on 14 the record at 11:01. 15 Q Mr. Weaver, I just want to ask you a couple of 16 questions about that lead and water commercial 17 that you have brought up a couple times. 18 A Okay. 19 Q When did you see that? 20 A It's probably been on the last two years, 21 three years. 22 Q What channel is that on? 23 MS. PETERSON: Objection. 24 A I couldn't tell you what channel. 25 Q Like, what time of night? What are you watching</p>		<p>1 MS. BACA: Sorry. Can I take this 2 off? 3 THE REPORTER: Yeah. It peels off 4 easy. 5 Q Mr. Weaver, does this look like some of the diet 6 bags of Regional Red that you would have bought 7 for Jack? 8 A Yes. 9 Q Okay. And based on this bag, it looks like it was 10 made in Canada, correct? 11 A Yep. 12 MS. PETERSON: I think you're 13 looking at the other one. 14 THE WITNESS: I was just trying 15 to -- 16 MS. PETERSON: Oh, I'm sorry. 17 Yeah. 18 THE WITNESS: -- compare the two. 19 Q So besides the difference in the vacuum -- the 20 vacuum sealed bag, were there any other 21 differences that you might have noticed or that 22 affected you? 23 A Didn't notice at the time, no. 24 Q Did your dog have any issue transitioning from the 25 food that was produced in Canada to the food that</p>	

Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 121	Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 123
<p>1 was produced in Kentucky?</p> <p>2 A No.</p> <p>3 Q At any point in time did Jill or Prince Harry eat the Regional Red?</p> <p>4 A No.</p> <p>5 Q They only ate Six Fish?</p> <p>6 A Six Fish.</p> <p>7 Q Okay.</p> <p>8 A Jill had a real flowing coat, and that's -- so we attributed it to the Six Fish.</p> <p>9 Q When we were going over some of the different statements and areas of the bags earlier, you mentioned that you read the ingredient panel and the guaranteed analysis, correct?</p> <p>10 A I --</p> <p>11 MS. PETERSON: Objection, misstates the testimony -- the exact testimony. He said he -- he read some of the ingredient panel.</p> <p>12 Q Mr. Weaver, did you read some of the ingredient panel?</p> <p>13 A Yes.</p> <p>14 Q And why did that draw your attention more than other areas of the bag?</p> <p>15 A To see what the percentages were in the food</p>		<p>1 Q Anything else?</p> <p>2 A We have a pontoon boat. We take the dogs on the pontoon when we go out.</p> <p>3 Q Where do you go? Like, a lake?</p> <p>4 A Yeah. There's lakes around here. Yes.</p> <p>5 Q All right. Are there any answers you've given me today that you would like to change?</p> <p>6 A (No audible response.)</p> <p>7 MS. BACA: Okay. At this time I'm done with my questions, Rebecca.</p> <p>8 MS. PETERSON: Okay. I have a few that I just want to --</p> <p>9 MS. BACA: Sure.</p> <p>10 MS. PETERSON: -- clean up. And that -- it goes to the --</p> <p>11 EXAMINATION</p> <p>12 By Ms. Peterson:</p> <p>13 Q Mr. Weaver, I know that last winter into the spring was a hard time, and it was a while ago, but I believe you are -- you testified earlier that you were uncertain on the last date you bought Orijen dog food, but you thought it was either in April or May; is that correct?</p> <p>14 A Correct.</p> <p>15 Q Okay. And if I refresh your memory that the first</p>	
Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 122	Videotaped Deposition of SCOTT WEAVER, 6-19-19	Page 124
<p>1 versus trying to understand what this whole thing is. That's ridiculous.</p> <p>2 Q Do you see the guarantee analysis on our <u>Exhibit 8</u>? It's on the right-hand side.</p> <p>3 A Yes.</p> <p>4 Q It's a square. What about the guaranteed analysis was important to you?</p> <p>5 A I would be looking at what the percentages are to make sure that it wasn't heavy weighted one way or the other, and the omegas for -- for their coats.</p> <p>6 Q Can you explain what "heavy weighted one way or another" means?</p> <p>7 A Well, it's pretty much even, and there's nothing -- like the crude fiber. We have specific levels that we were looking for and the fat so that it wasn't too fat for them, because we didn't want them to gain weight.</p> <p>8 Q Okay. So we talked about some of your hobbies earlier. You mentioned your dogs are your hobbies?</p> <p>9 A Mm-hmm.</p> <p>10 Q Do you have any other hobbies? Do you hunt?</p> <p>11 A No.</p> <p>12 Q Do you fish?</p> <p>13 A No. We boat.</p>		<p>1 time you contacted me regarding seeing the lawsuit in California, it was in April of 2018?</p> <p>2 A Correct.</p> <p>3 Q Okay. And at that point, we then added you to the amended complaint that we filed in California as a named class rep. Do you recall that?</p> <p>4 A Yes.</p> <p>5 Q Okay. And that was filed on April 19th, 2018. And you would not have purchased Orijen pet food products after you contacted me, correct?</p> <p>6 A Correct.</p> <p>7 Q Okay.</p> <p>8 A I specifically remember even the bags in the -- in the feeding station that we threw them away because we were -- at first I -- I think I may have said, "Should we donate them to the Humane Society," and Sue said, "Why?" I said, "Okay. Throw them away." So I threw them away.</p> <p>9 Q Okay. And just -- I want to talk to you a little bit about AAFCO, which has been raised a couple times. That's -- AAFCO's nothing that you as a consumer understand what it is, correct?</p> <p>10 A I have no idea, no.</p> <p>11 Q And you've never seen the actual AAFCO official publication --</p>	

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 125

1 A No.
2 Q -- available or referenced? Okay. And then just
3 a couple things on the labels. I'm going to give
4 you exhibit -- I'm just going to stay with the
5 Kentucky food for now, and so Exhibits 4 and 5,
6 which are the regional and Six Fish. And I
7 just -- I want to -- she asked you a question, and
8 I think there was maybe a little bit
9 miscommunication between the two. She asked, you
10 know: Is there anything that would make you think
11 that this food is not nutritional, and I believe
12 you were looking specifically at the label. And
13 so if the label had the disclosure, which you
14 think it should have, which says, "Has a risk of
15 heavy metals," would that affect your opinion that
16 this -- that Six Fish or Regional Red, Exhibit 4
17 or 5, have the same nutritional value as you
18 thought when you bought it?
19 A If it stated that --
20 Q Mm-hmm.
21 A -- on there, I wouldn't have bought it.
22 Q Okay. And the same, if it had a disclosure that
23 it had a risk of BPA, would you --
24 A That's the same. I wouldn't have bought it.
25 Q And if it had a label that had the risk of

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 126

1 pentobarbital, would you --
2 A Wouldn't have bought it.
3 Q Because that affects the nutritional value?
4 A Correct.
5 Q Do you -- is it your understanding, you know, they
6 were -- they asked you what was your -- your
7 understanding of biologically appropriate. Do you
8 think biologically appropriate means that the pet
9 food has heavy metals in it?
10 A No.
11 Q Do you think biologically appropriate portrays to
12 you as a consumer that it has BPA in it?
13 A No.
14 Q Or that it has a risk of BPA?
15 A No.
16 Q Do you think biologically appropriate relates to
17 you as a consumer that there is a risk of
18 pentobarbital?
19 A No.
20 Q And then at one point, I believe there was a
21 question where you were asked anywhere on this
22 food label -- either label -- do they -- do they
23 state that they're free of BPA?
24 A Right.
25 Q And you said that -- you testified no?

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 127

1 A No.
2 Q And for heavy metals, and you testified no, and
3 for toxins, and you testified no, correct?
4 A Correct.
5 Q Would you say that these labels, however, imply
6 that it's free of metals, BPA --
7 MS. BACA: Objection.
8 Q -- and toxins?
9 MS. BACA: Calls for --
10 A I would say, again, they're telling me that it's
11 biologically appropriate, that it's naturally
12 sourced. I assume that they would have done
13 testing or it wouldn't contain things that would
14 harm my pets.
15 Q Including heavy metals?
16 A Absolutely.
17 Q Including BPA?
18 A Absolutely.
19 MS. PETERSON: Objection.
20 Q Including pentobarbital?
21 A Absolutely.
22 Q And then let's go to label 5 -- or Exhibit 5,
23 which is the Six Fish label. She would -- did --
24 you had some conversation today about the term
25 "regional" specifically limited to the fish. Do

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 128

1 you recall that?
2 A Mm-hmm.
3 Q Okay.
4 A Yes.
5 Q So you'll -- on these pet food bags, you'll see
6 that the term "regional" is used, especially if
7 you look at, for instance, Regional Red, correct?
8 A Yes.
9 Q So you understand in Six Fish and both
10 Regional Red that there are ingredients beyond the
11 fish coming from New England, correct?
12 A Correct.
13 Q And so would you think that kibble made with
14 regional ingredients, whether it be vegetables,
15 those vegetables would be coming from the region
16 close to the Kentucky DogStar?
17 A Where it's --
18 MS. BACA: Objection.
19 A -- produced, correct.
20 Q And so would you think regional ingredients would
21 come from California?
22 A No.
23 MS. BACA: Objection.
24 A No.
25 Q Would you think regional would come from India?

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 129

1 A No.
2 MS. BACA: Objection.
3 Q Would you think regional ingredients would come
4 from China?
5 MS. BACA: Objection.
6 A No.
7 Q Would you think regional ingredients would come
8 from Ohio?
9 MS. BACA: Objection.
10 A No. I would say -- think it was more Kentucky, if
11 that's where it's produced.
12 Q Okay. Would you think -- and then finally, she
13 asked you about the term "never outsourced." Do
14 you remember that?
15 A Yeah.
16 Q Okay. Would it be your understanding if meal was
17 made that was included in either Regional Red or
18 Six Fish by a third party is -- is not outsourced
19 by Champion?
20 A No. If it's a third party, it's outsourced.
21 Q And would you agree that ingredients that have
22 pentobarbital would be fit for human consumption?
23 A No.
24 Q Do you understand -- do you know that
25 pentobarbital is a regulated barbiturate --

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 131

1 is regional, whether it be in its name or that it
2 says "fresh and regional"?
3 A Yes.
4 MS. BACA: Objection.
5 Q And is that something you relied on in making the
6 decision to purchase this product?
7 A Yes.
8 MS. BACA: Objection.
9 A They did all the click words, "Trusted pet lovers,
10 cherished dog, healthy." Of course, we thought
11 all was good.
12 Q Would you have purchased this Regional Red if you
13 knew that the tallow and meal were coming --
14 MS. BACA: Objection.
15 Q -- from the same supplier that made the meal and
16 tallow for Gravy Train?
17 A No.
18 Q And you know what Gravy Train is, correct?
19 A Yeah.
20 Q Is \$0.99 can?
21 A Yeah.
22 Q So you would not think that a \$90-plus bag would
23 use the same supplier --
24 MS. BACA: Objection.
25 Q -- as a \$0.99 can?

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 130

1 MS. BACA: Objection.
2 Q -- by the FDA?
3 A I didn't know it, but, okay.
4 Q And then the -- would you think that if you look
5 on these -- both these exhibits and they talk
6 about fresh, you see that certain times they do
7 say, "Delivered daily"?
8 A Yep.
9 Q So would you think that fresh means that they were
10 delivered daily and used in the food that day?
11 A Yes.
12 Q Okay. And so whether it comes in refrigerated or
13 not, it's that they -- would you think fresh fish
14 would be fish that's caught in the ocean by their
15 supplier and not used for five months and later?
16 MS. BACA: Objection.
17 A That's not fresh, no.
18 Q Even though it's refrigerated?
19 MS. BACA: Objection.
20 Q Okay. And then if you look on the second page of
21 Exhibit 4, please.
22 Did you look at the back of this bag and see
23 the emphasis on "trust" and "trusted"?
24 A Of course.
25 Q And did you also consider the claim that this food

Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 132

1 A Correct.
2 MS. PETERSON: That is all I have.
3 MS. BACA: I have a follow-up
4 question.
5 MS. PETERSON: Sure.
6 EXAMINATION
7 By Ms. Baca:
8 Q Mr. Weaver, if you can look at exhibit -- is it 5?
9 MS. PETERSON: Sorry. 5 -- or 5.
10 Q Exhibit 4 and Exhibit --
11 MS. PETERSON: So that's 4 and 5 --
12 THE WITNESS: 4 and 5?
13 MS. PETERSON: -- are the DogStar.
14 Q Could you please take your time and read the
15 ingredient -- the ingredient list, the entire
16 list, please. Did you finish the Six Fish
17 ingredient list?
18 A Mm-hmm.
19 Q Okay. So you read the ingredient list for the
20 DogStar Six Fish package.
21 A Yes.
22 Q Did you see anywhere on there the ingredient of a
23 fish meal or a meat meal?
24 A I don't recall seeing it on here, no.
25 Q Please take your time. Let me know if you see it.

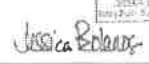
Videotaped Deposition of SCOTT WEAVER, 6-19-19 Page 133

1 A I don't see meal on here.
2 Q Thank you. Could you please read the ingredient
3 list on the Regional Red from DogStar.
4 A Okay.
5 Q Is there meat meal in there?
6 A I don't see that in here either.
7 MS. BACA: Okay. Thank you.
8 MS. PETERSON: Just one follow-up.
9 EXAMINATION
10 By Ms. Peterson:
11 Q Are you aware under AAFCO if they have to use the
12 word "meal" or if there's other terms they can
13 use?
14 MS. BACA: Objection.
15 A I'm not aware. I know I -- If it's called
16 something else, I don't know what else it would be
17 called.
18 Q Correct. So you wouldn't know if de-boned mutton
19 or de-boned lamb or de-boned beef would --
20 MS. BACA: Objection.
21 A No, I wouldn't know that. It doesn't say, "meal,"
22 and that's what the question asked me.
23 MS. BACA: Okay. Thank you.
24 MS. PETERSON: That's it.
25 MS. BACA: All right.

Page 134

1 THE VIDEOGRAPHER: Off the record
2 at 11:19.
3 (Adjourning at 11:19 a.m.)
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Page 135

1 STATE OF WISCONSIN)
2 COUNTY OF DANE } SS
3 I, JESSICA BOLANOS, a Notary Public in and for the
4 State of Wisconsin, do hereby certify that the
5 foregoing videotaped deposition was taken before me
6 at the offices of Verbatim Reporting, Limited, Two
7 East Mifflin Street, Suite 102, City of Madison,
8 County of Dane, and State of Wisconsin, on the 19th
9 day of June 2019; that it was taken at the request of
10 the Defendants upon verbal interrogatories; that it
11 was taken in shorthand by me, a competent court
12 reporter and disinterested person, approved by all
13 parties in interest and thereafter converted to
14 typewriting using computer-aided transcription; that
15 said deposition is a true record of the deponent's
16 testimony; that the appearances were as shown on
17 Page 3 of the deposition; that the deposition was
18 taken pursuant to notice; that said SCOTT WEAVER
19 before examination was sworn by me to testify to the
20 truth, the whole truth, and nothing but the truth
21 relative to said cause. Dated June 21, 2019.
22
23 
24 Notary Public, State of Wisconsin
25

	act (1) 112:7	61:24;64:18;66:2; 93:14;94:21;97:10; 101:4	89:15;90:23;92:25; 126:7,8,11,16;127:11	6:25
\$	action (6) 71:6;110:11,12; 111:12,16;112:3	aimed (2) 30:10,12	approximately (9) 43:19;45:20,22;46:1; 48:6;53:16;66:19,20; 67:16	audience (1) 18:9
\$0.99 (2) 131:20,25	actual (4) 9:14;79:9;80:20; 124:24	air (2) 32:2;74:6	April (14) 22:12,14;67:8,19; 71:21;96:3,7,8;106:6,7, 9;123:23;124:2,8	available (1) 125:2
\$1,400 (1) 51:25	actually (6) 10:17;22:11;28:14; 47:18;108:6;119:6	AKC (1) 11:4	April/May (1) 69:1	average (1) 66:19
\$1,453 (1) 109:8	add (1) 51:24	Alaska (1) 16:18	area (4) 25:23;84:1,9;85:14	Award-winning (1) 86:13
\$106 (1) 33:9	added (5) 63:10,12,13;88:22; 124:4	allergic (4) 34:7;47:20,20;48:6	areas (3) 93:16;121:12,24	aware (16) 36:1;37:6;57:23; 82:10;88:11;89:9; 91:14;92:17;101:15, 15;102:3,7;111:12; 114:7;133:11,15
\$108 (1) 33:10	adding (2) 90:6,9	allergy (2) 47:13,18	arise (1) 63:15	awareness (1) 107:15
\$2,500 (1) 52:3	addition (1) 34:10	allow (1) 85:11	arises (1) 114:14	away (12) 22:5,10,22;23:19; 46:4,8;57:9;99:16; 108:17;124:14,18,18
\$300 (1) 13:11	additional (2) 93:23;98:4	allowed (2) 40:10,10	around (12) 15:1;25:11;26:25; 32:11;48:1;53:23; 73:20;102:11;105:24; 109:11;116:25;123:5	awesome (1) 25:13
\$68 (1) 56:2	address (9) 5:10,12,13,14,17; 16:9;38:3,5;96:22	alternate (1) 50:20	arsenic (2) 50:1;91:9	
\$90-plus (1) 131:22	Adjourning (1) 134:3	alternative (1) 98:24	article (2) 7:17;8:4	B
A	adult (5) 30:25;31:1;45:12,18, 19	Although (1) 26:5	articles (3) 8:4,6;37:23	BA (1) 81:3
AAFCO (5) 55:19;82:12;124:20, 24;133:11	advertising (2) 12:19;113:25	always (8) 30:1;53:9;70:9; 98:16;99:17;100:16, 17;115:22	artificial (1) 41:11	Baca (47) 4:17,17;5:5;8:3; 9:11;24:6;39:3,7,10; 44:7;65:4,8;68:16; 69:15;79:19;80:3; 95:16,19;96:23;106:8; 117:22,25;118:6; 120:1;123:9,13;127:7, 9;128:18,23;129:2,5,9; 130:1,16,19;131:4,8, 14,24;132:3,7;133:7, 14,20,23,25
AAFCO's (1) 124:21	advisory (1) 104:12	amended (7) 65:22;66:6,9,15; 107:3,6;124:5	Association (1) 82:11	back (30) 10:20;14:16;15:7,10; 31:21;32:5;33:15; 39:14;42:15;62:25; 65:12;67:10;75:21; 80:4,20,23,25;82:23; 84:25;89:18;92:14; 95:23;108:12,15; 109:1,13;110:7,8; 118:13;130:22
ability (2) 7:8;26:16	affect (2) 102:19;125:15	American (1) 82:11	assume (3) 89:11;106:24;127:12	backed (1) 108:13
able (2) 32:13;48:25	affected (1) 120:22	amount (5) 42:20;49:13;51:16; 89:12;90:21	ate (2) 49:15;121:6	backgrounds (1) 21:10
above (2) 5:3;44:16	affects (1) 126:3	analysis (4) 82:18;121:14;122:3, 6	Atlantic (2) 84:3,21	backseat (1) 115:21
Absolutely (5) 29:3;110:1;127:16, 18,21	afternoon (2) 49:12;96:5	Animal (3) 12:8;30:21;103:7	attend (3) 11:7,13;12:21	backyard (3) 99:9,15;108:9
Acana (7) 36:8,14,15;37:4; 43:20;44:25;45:1	afterwards (2) 11:14;12:24	annual (1) 98:12	attended (2) 11:19;43:17	bad (2) 71:10;92:23
acceptable (1) 42:20	Again (4) 51:22;93:1;111:14; 127:10	answered (3) 105:11,12,17	attention (10) 21:1;44:15;72:13; 74:9;75:20,22;76:19; 80:6;105:8;121:23	bag (54) 31:20,22;32:3,24; 33:9,10,11,12;46:21,
Accessories (2) 16:12,13	against (4) 37:23;112:17;114:5, 8	anticipated (2) 19:8,13	Attesting (1) 67:25	
accident (1) 14:16	age (2) 116:4,6	anymore (2) 32:21;101:19	attorney (4) 107:1;109:22,24; 111:22	
accidentally (1) 79:19	ago (7) 16:1;39:18;102:12; 111:24;116:15;119:16; 123:19	apologized (1) 110:6	attorney/client (2) 7:24;64:15	
accomplished (1) 80:16	agree (3) 88:16;94:14;129:21	appearances (1) 4:14	attorneys (2) 7:18,19	
account (3) 19:21;21:4;69:23	Agreed (2) 8:3;109:17	applies (1) 85:22	attributed (1) 121:10	
accounts (1) 20:14	agreement (1) 106:24	appropriate (17) 77:5;78:16,17,24; 80:8,12;81:6,15;88:25;	audible (2) 66:11;123:8	
accurate (1) 65:23	ahead (7)		audibly (1)	
acid (1) 104:11				
acquired (2) 13:19;14:14				
across (3) 16:15;37:22;119:10				

23,24;47:1,4,8,10,11; 48:21;49:1,6,7;51:7,9, 9;55:3,22;56:4;72:2; 10,14,23;74:8;75:1,21; 78:14;82:4,5;84:1,7, 25;85:14;87:25;88:1,1, 4,6;100:24;101:14; 103:2;119:22;120:9, 20;121:24;130:22; 131:22	82:17 Beltline (1) 96:15 beside (3) 44:23;50:5;71:15 besides (9) 10:13;41:4;42:4; 50:19;51:6;58:14; 59:18;116:7;120:19 best (1) 93:2 better (2) 109:1;113:5 beyond (1) 128:10 big (10) 25:1;27:3;33:12; 42:18;47:10;51:8; 56:14;85:21;107:8,9 bigger (1) 87:11 billion (1) 91:1 bin (1) 60:17 bins (2) 60:18,22 biodegradable (1) 99:14 biologically (18) 77:5;78:15,16,24; 80:8,11;81:5,15;88:24; 89:15;90:23;92:25; 113:7;126:7,8,11,16; 127:11 biologist (2) 88:10;105:5 Biology (2) 12:6,8 biopsies (2) 97:17,25 birth (3) 5:22;9:2;39:17 birthday (2) 25:25;26:1 births (1) 9:12 bison (5) 34:6;37:2;44:4; 47:22,23 bit (20) 8:16;11:15,24;13:22; 21:12;25:14;31:4,9; 33:18;42:22;46:14; 48:12;54:10;73:7; 74:12;76:20;86:8; 118:2;124:20;125:8 black (2) 74:16;84:1 blah (2) 110:6,6 blah' (1) 110:7	blankets (2) 18:6;115:22 bleeding (1) 28:20 Bless (1) 40:16 blew (1) 22:24 blogs (3) 37:23;38:2,11 blood (9) 23:15;47:19;97:4,7, 13,14,20;98:2,4 boat (2) 122:25;123:2 body (1) 93:15 boil (2) 104:7,13 bones (2) 98:21,21 born (4) 39:16,18,21,24 both (9) 10:3;22:13;23:2; 45:25;69:24;83:9; 98:19;128:9;130:5 bother (1) 81:14 bottle (1) 62:4 bottom (3) 76:20;81:2;86:20 bought (20) 15:10;32:10;33:3,4, 6;40:1;46:5;52:15; 54:18;78:7;81:19;84:7; 85:15;88:20;120:6; 123:22;125:18,21,24; 126:2 bowl (3) 60:19,21;95:9 boy (1) 26:9 BPA (21) 20:6,17;30:17;58:8; 59:12;63:13,21;64:3,8; 90:7,13,22;91:1;92:6; 105:14;125:23;126:12, 14,23;127:6,17 BPA-free (1) 88:4 brain (1) 28:19 brand (8) 29:16;32:13;47:4; 50:3;96:24,24;115:20; 117:17 brands (3) 18:18;31:5;32:24 break (11) 23:21;29:12;39:4; 65:3,4,5,7;95:17;96:1;	108:11;117:23 breed (5) 21:25;40:11;54:3,8; 116:10 breeder (27) 27:15,20;29:9;30:7; 31:6;34:12,14,14,15, 17;40:2,9,15;41:10,12; 42:4;54:12,13;57:6; 63:2;116:17,19,22; 117:3,5,8,10 breeders (3) 29:25;116:23,25 breeder's (1) 58:14 brick (4) 31:25;52:20;70:14, 16 Bridge (1) 15:24 bring (2) 107:6;119:21 bringing (1) 91:23 Brita (1) 119:6 brochure (1) 43:13 brochures (1) 43:11 broke (1) 31:23 broker/rep (1) 18:1 brother (2) 21:6,6 brothers (1) 40:13 brought (5) 42:15;71:19;114:7; 115:20;118:17 bucks (5) 33:13;34:21,22; 48:22;52:11 built (2) 60:13;97:1 burst (1) 28:19 business (7) 5:12;11:17;12:15,16; 15:2;17:23,25 buy (18) 10:1,2;14:3;31:13, 18;32:6,24;33:10;42:6, 25;46:19;47:1,10;49:3; 50:2;52:5,8;62:20 buyers (1) 14:2 buying (9) 13:11,12;34:24;43:1; 56:4,23;62:14;74:5; 92:8 buys (1)	53:14 C cables (2) 16:3,14 cadmium (1) 91:9 calculation (1) 51:22 California (5) 57:24;68:9;124:2,5; 128:21 call (5) 19:4;41:8;55:2; 108:23,24 called (15) 5:2;14:15,22;15:23; 16:7,8;47:19;57:24; 96:14;108:25;109:20, 23;110:15;133:15,17 calls (6) 51:20;76:12;90:15; 97:9;104:19;127:9 caloric (2) 33:24;82:21 came (5) 14:16;50:11;84:17; 107:15;109:13 can (53) 4:16;7:1;9:13;12:14; 13:22;18:24;19:13; 25:13;29:2;32:16;35:4, 12;37:10;50:14;51:19, 21;52:11;53:9;55:3; 56:12;60:5;61:9,24; 62:25;63:17;67:10,20; 69:13;71:21;74:7; 75:20,22;79:25,25; 81:24;82:6;89:23; 90:11;96:18;99:1,15; 101:4;110:5,16; 112:15;113:11;117:22; 120:1;122:11;131:20, 25;132:8;133:12 Canada (6) 31:24;101:17,18; 102:5;120:10,25 cancer (22) 22:13,16,18,18,24; 23:2;28:5,14,18,23; 45:25;56:24;57:6; 58:21,23;64:11;71:5, 20;79:5,8;106:2;116:2 canned (3) 99:1,3,10 cans (1) 99:2 capital (1) 110:18 captain (1) 10:10 Caption (1)
---	--	---	--	---

4:6 car (5) 23:13;24:9;108:8,16, 22 carb (1) 81:12 carbohydrate (1) 81:6 Carbs (1) 81:14 card (4) 32:19;69:8,11,18 cards (2) 69:19,23 care (2) 13:13;26:8 carp (1) 84:19 carried (1) 24:9 cartilage (1) 76:25 cartoon (1) 75:24 case (15) 4:6,10;5:3;64:17,18; 68:9,10;87:17;92:19; 109:14;110:2,5,9,9; 114:10 cat (4) 80:12;115:9,9,9 category (1) 14:1 caught (1) 130:14 cause (4) 57:11;116:1,2,5 causes (1) 112:20 causing (1) 64:11 cell (2) 16:3,11 Central (2) 68:8,9 certain (3) 64:16;83:1;130:6 certainly (1) 103:8 certificate (1) 11:21 certifications (1) 12:25 Chagrinfallspetcliniccom (1) 38:20 chain (1) 52:12 Champion (60) 4:7,19,22;29:6,6,8, 10,13;30:23;34:12; 35:2,19;36:13;37:6,24; 38:1;43:9,11,13,15,25; 44:22;45:2,8,15,24;	46:19;48:4;52:16,20, 25;53:5,14,22;54:22; 56:23;58:19;62:18; 63:11;67:14;68:25; 71:10;76:10;80:10,16; 86:4;87:13,13;88:21; 89:9;91:24;92:17;93:4; 101:15,22;103:2; 112:18;113:23;114:5; 129:19 championpetfoodscm (1) 36:6 Champion's (15) 10:2;31:3;36:1,5; 41:24;48:7;49:16,17; 51:11,17;52:5;83:12; 88:17;90:6;92:9 change (6) 32:15,15;102:22; 113:18,20;123:7 changed (3) 59:4;78:7;115:15 changing (1) 113:17 channel (3) 118:22,24;119:5 characteristics (1) 34:1 charge (1) 16:5 charged (1) 107:19 chargers (2) 16:3,14 chart (2) 107:4,13 cheap (1) 33:10 cheapest (1) 109:8 check (2) 93:21;118:4 checking (2) 93:23;105:19 checks (1) 100:10 checkup (1) 98:12 checkups (1) 98:11 chefs (1) 90:19 chef's (1) 77:8 Chelsea (1) 38:5 chemical (2) 42:8;81:21 chemicals (3) 42:13;81:22,25 chemist (2) 64:1,23 chemistry (1)	12:2 cherished (1) 131:10 Cherokee (1) 115:21 chew (2) 94:16,17 chicken (2) 56:9,11 children (3) 10:4,6;115:14 chin (1) 35:15 China (1) 129:4 choose (1) 99:3 Christmas (1) 26:2 chunks (1) 61:13 circle (1) 31:16 circles (1) 31:15 circulating (1) 101:23 city (3) 42:18;109:21,24 claim (1) 130:25 claims (7) 108:5,6;110:11,11, 23;112:17,19 clarify (4) 6:19;81:24;82:6; 83:6 class (9) 68:7,8;111:3,5,9,12; 112:3,12;124:6 classes (2) 12:17,19 Clean (3) 37:19;104:11;123:14 cleans (1) 61:5 clear (2) 74:80;11 clearly (1) 113:4 clerk (1) 33:8 click (2) 81:15;131:9 Clinic (2) 41:6;42:1 clip (1) 32:25 Close (4) 10:24;21:1;41:12; 128:16 closest (1) 84:24	Cloth (1) 95:6 CLVS (1) 4:11 coat (1) 121:9 coats (3) 31:8;34:19;122:10 Cocker (1) 115:8 codes (1) 33:8 Coke (1) 89:24 collars (1) 53:4 college (2) 11:13;12:21 combine (1) 47:3 comfortable (1) 9:22 coming (4) 109:2;128:11,15; 131:13 commercial (6) 42:16;89:18;103:23; 118:16;119:5,14 commercial's (2) 104:1,2 commitment (1) 15:17 committed (1) 15:7 communications (1) 8:1 community (1) 104:7 companies (4) 17:1;85:10;111:1; 119:7 company (10) 13:18,19;14:20,21; 15:23;16:2,4,7;18:3; 31:11 company's (1) 119:14 compare (1) 120:18 compared (1) 59:5 complaint (14) 21:15,23;61:24; 65:22;66:3,6,9,15; 68:14;91:8,22;107:3,7; 124:5 complaints (1) 63:17 compromised (1) 95:2 computer (2) 18:24;38:3 concept (2)	77:2;85:17 concerned (3) 48:17;74:6;93:6 conclusions (2) 28:22;107:16 conduct (1) 30:5 conducted (2) 33:16;35:19 confidential (3) 9:9,15;69:10 confirm (4) 45:2;50:18;69:6; 82:10 confirmation (1) 96:1 confused (1) 44:3 Congratulations (1) 8:23 conscious (1) 26:16 consider (2) 18:21;130:25 considerations (2) 55:12;58:15 constantly (2) 21:8;24:4 consumed (1) 28:11 consumer (4) 92:7;124:22;126:12, 17 consumers (1) 91:25 consuming (3) 50:18,20;99:21 consumption (4) 87:6,19;103:8; 129:22 contacted (5) 71:6;106:11;111:18; 124:1,10 contain (5) 92:5,6,6,18;127:13 containers (4) 50:22,22,24;51:2 contains (1) 63:4 contaminants (1) 103:16 contaminated (3) 66:18;104:15,17 content (3) 7:23;33:24;82:21 context (1) 76:8 continuing (1) 74:8 Control (1) 82:11 conversation (4) 7:23,23;18:14;
---	--	---	---	--

127:24 convulsing (2) 22:21;23:12 cook (4) 59:23,24;60:6,7 cops (1) 109:2 copy (4) 65:23;72:4;79:20; 80:5 corner (2) 80:2;92:14 corporate (1) 13:20 correcting (1) 72:9 correctly (16) 7:2;66:17;67:1,2,17, 18;74:24;76:5,25; 80:13;81:7;85:12,13; 87:7;92:3;101:21 cost (5) 43:3;48:23;55:25; 56:24;99:4 costs (1) 114:14 COULSON (11) 4:20,20;37:14;65:2; 69:13,17;70:1;106:9, 12;118:2,7 counsel (11) 4:13;5:24;6:1;69:14, 15,24;71:1;92:20,22; 106:25;110:21 country (7) 15:2,4;16:15;83:19, 22,24;117:1 County (1) 110:14 couple (10) 17:8;38:10;51:24; 54:4;102:12;105:12; 118:15,17;124:20; 125:3 course (8) 9:21;15:9;21:3;42:9; 86:19;114:21;130:24; 131:10 courses (3) 12:2,12,16 coursework (1) 11:24 Court (7) 4:8;7:1,5;109:14,20; 110:9;114:14 cover (1) 114:14 created (2) 79:5,7 credit (5) 69:8,11,18,19,23 crematory (1) 24:11	crime (1) 107:19 Crosse (1) 11:11 crowd (1) 27:10 crude (2) 42:9;122:14 cup (2) 48:13;49:14 currently (5) 8:19;9:4;10:13,22; 116:7 custom (3) 35:12;53:3;60:12 customers (1) 15:5 cylinder (1) 60:15 D da (3) 33:5,5,5 dabbled (1) 19:22 daily (4) 62:22;73:9;130:7,10 damage (2) 109:3,16 Dane (1) 110:14 date (20) 4:2;5:22;9:2,12;67:2, 5,6;68:3,6,22,24;71:19, 21,22;96:2,8;102:6; 106:23;109:19;123:21 dates (2) 39:17;66:12 date's (1) 109:21 David (1) 4:20 day (7) 23:8,8;49:8,10,11; 98:18;130:10 days (1) 13:7 dead (1) 78:15 dearly (1) 117:2 death (4) 80:17;96:7;116:1,5 de-boned (3) 133:18,19,19 decided (2) 42:6;117:9 decipher (1) 42:7 decision (5) 56:17;93:17,19; 102:19;131:6	deemed (3) 9:15;87:5,19 defendant (1) 107:24 Defendants (1) 4:18 define (1) 78:16 defined (1) 82:14 definition (2) 83:20,23 definitions (1) 82:14 degree (1) 11:21 degrees (1) 12:25 dehydrated (2) 76:4;87:3 deliver (1) 26:11 delivered (4) 73:9,23;130:7,10 denotes (1) 31:16 deposed (1) 6:14 deposition (5) 4:4,21;6:12;37:10; 69:25 describe (5) 13:22;26:23;27:22; 56:12;98:8 descriptive (1) 92:7 designate (1) 9:8 detect (1) 94:10 DFA (1) 93:20 diagnosed (4) 28:14;106:2,13,15 Dichi (2) 40:18,21 D-I-C-H-I (1) 40:20 dickhead (1) 110:19 die (2) 58:21,23 died (5) 45:25;56:24;68:5; 71:4,4 diet (9) 29:16,20,23;47:21; 56:9;76:21;89:24;93:4; 120:5 diets (10) 30:23;43:25;44:17, 23,25;45:3,6;50:21; 61:8;79:14	difference (3) 92:10;102:7;120:19 differences (1) 120:21 different (17) 10:19;19:5;27:21; 30:2;31:4,10;48:18,19; 54:4;57:9;59:1;70:24; 75:24;76:8;99:11; 117:9;121:11 differs (1) 58:18 digits (2) 69:8,20 dinner (2) 60:10;104:8 direct (3) 72:13;74:9;75:22 directing (1) 70:3 directly (1) 52:15 director (1) 14:8 disabled (2) 10:12,15 disclosure (4) 92:9;103:2;125:13, 22 discuss (2) 29:3;46:18 discussed (4) 28:3,9;29:1;92:21 discussing (3) 67:3;82:18;92:19 discussion (2) 28:7,10 discussions (1) 64:17 disgusting (1) 98:20 dish (4) 35:14,17;60:24;61:4 dishes (2) 61:1,4 dispute (1) 72:25 District (4) 4:8,9;57:24;68:9 diverse (1) 25:20 Division (2) 4:9;16:6 document (5) 6:9;44:11;65:18; 67:22;101:6 documents (3) 8:14;24:2;91:20 dog (113) 11:5;17:2,3,4,6; 23:18;24:19,20;25:9, 10,14,16;26:14;29:5,6; 30:3,23;31:5;32:24; 33:12,17,20;34:2,13; 41:24;42:2;43:2,17,18, 25;44:22;45:2,9,15,24; 46:8,19;47:2;48:4; 49:16,17;51:4,15,17; 52:5,15,20,25;53:6,14, 22,24;54:2,18,22; 56:23;57:9,17,19,22; 58:3,8,13,19;59:3,24; 60:9;62:11,12;63:3,11; 66:19;67:15;68:25; 70:5;71:3,25;72:20,22, 25;73:13,14,23;75:2,9; 77:3,5;80:12,16;86:14; 87:10;88:22,25;89:14; 91:15,19;92:24;95:9; 96:7;98:9;99:6;100:18; 101:7,16;102:3;105:7, 20;113:24;115:13,18; 120:24;123:22;131:10 Dogfoodadvisor.com (1) 38:18 dogs (85) 11:2,2,3;20:23;21:2, 13,18,19,20,22,25; 22:4,16;23:2,24,8; 25:10;26:1,17,21,22, 22,24;27:6,12,14,17, 21;28:4,10;29:5,23; 30:20;31:2;33:22; 34:25;35:1,11,16; 39:16;40:1,4,8,24; 41:3;42:23;44:1,18; 49:8,13,15;50:18; 53:10,10;56:24;58:23; 60:6;61:2;67:15;71:4; 75:18;78:18;79:6; 80:17;88:20;93:1,2,7; 94:16;96:6;98:15;99:5, 9,21;100:7,10;112:21; 115:2,4,5,16,18,23; 116:7;122:19;123:2 dogs' (1) 32:16 dog's (3) 29:4;57:2;90:20 DogStar (8) 83:8,12;85:9;86:13; 128:16;132:13,20; 133:3 dollars (3) 28:16;51:23;56:25 donate (1) 124:16 done (15) 11:25;89:1,4;97:13, 21;98:2,4;113:3,4,12, 13;118:1,6;123:10; 127:12 down (18) 7:2;29:12;47:10,11; 51:9;66:25;68:6;73:6, 6;75:23;76:20;82:22;
---	--	--	--

86:20;87:12;97:15; 104:4,6;115:22 dramatically (1) 115:15 draw (2) 27:10;121:23 dried (1) 74:22 drink (4) 42:21;89:21;90:1,4 Drive (4) 5:11;15:6,13;32:11 driver (2) 26:10,11 driveway (1) 108:13 drool (1) 115:24 drove (1) 108:17 drug (1) 64:22 dry (2) 56:12;98:24 duly (1) 5:2 During (2) 49:15;102:8 duties (1) 112:11 DVDs (2) 15:24;16:1 dying (1) 16:2	eight (9) 10:19;15:16;22:8; 25:12;40:3;48:8;52:3, 14;116:16 either (8) 37:4;53:7;67:8; 113:20;123:23;126:22; 129:17;133:6 elevated (4) 97:4,6,21,23 eliminate (1) 103:13 Elisa (1) 4:17 else (13) 19:25;32:5;37:3; 43:7;51:4;53:13;59:18; 62:10;85:11,20;123:1; 133:16,16 else's (1) 112:15 e-mail (3) 5:14,17;16:9 e-mails (1) 18:24 emergency (2) 71:20;96:14 emotional (1) 9:19 emphasis (1) 130:23 employed (2) 9:4;14:4 employee (2) 54:18;55:4 employees (2) 55:6,8 employment (1) 13:2 end (2) 67:6;68:3 ended (2) 23:19;105:21 England (10) 83:4,5,9,15,22;84:8, 11,13,20;128:11 England's (1) 84:2 enjoys (2) 20:13,13 enough (2) 51:8;60:7 enter (1) 100:20 entire (1) 132:15 envelope (5) 32:20,22,23;33:4,7 envelopes (1) 32:21 environment (1) 88:12 environmental (1)	103:6 ER (4) 23:7;96:12,14;100:9 especially (1) 128:6 essentials (1) 5:18 E-S-S-E-N-T-I-A-L-S (1) 5:19 estimate (3) 51:16;109:5,6 estimates (2) 109:9,12 et (1) 4:7 etc (1) 9:13 European (2) 91:18,21 euthanasia (1) 64:22 Even (16) 19:21;77:21;78:3,21; 90:2,25;91:4;98:17,21; 99:13;100:6;115:25; 118:9;122:13;124:13; 130:18 event (1) 53:12 everybody's (1) 19:5 everywhere (3) 16:18;115:19,23 exact (9) 32:13;39:17;68:24; 71:21,22;78:9;102:6; 106:23;121:17 exactly (2) 82:4,5 EXAMINATION (4) 5:4;123:16;132:6; 133:9 excellent (3) 27:24;31:8;34:18 exclusively (3) 49:16;85:9;86:12 excuse (2) 22:6;84:4 Exhibit (33) 6:4,5;44:8,9;65:14, 15,16;67:10;71:24,24; 72:5;75:8,10,11,15; 79:10,11,17;80:24; 82:23;100:20,21,22; 119:23,24;122:4; 125:4,16;127:22; 130:21;132:8,10,10 Exhibits (2) 125:5;130:5 expect (1) 48:6 expense (1) 51:13	expensive (1) 62:23 experience (2) 26:13;77:17 experienced (1) 61:7 experiences (2) 17:8,10 expert (3) 90:16;97:10;104:20 explain (3) 25:13;95:25;122:11 explic (1) 110:7 explicit (1) 110:8 extension (1) 109:23 extent (2) 110:19;111:19 extra (1) 51:24 extremely (2) 22:19;24:18 eyes (2) 100:7,11	F Facebook (2) 19:15;20:2 facilities (1) 101:16 facility (4) 15:6;90:17;96:25; 97:2 fact (8) 8:1;75:5;84:10; 85:25;102:18;115:16; 117:20;119:11 factor (1) 56:17 factors (1) 42:5 factory (1) 77:9 fake (2) 104:1,2 familiar (3) 15:12;55:19;82:14 familiarize (2) 36:17;44:13 family (2) 111:25;114:22 Family-owned (1) 15:2 fantastic (1) 24:25 far (3) 21:4;54:19;81:3 farmer's (2) 27:3,4 fat (6)	33:22,23;42:9;82:19; 122:15,16 FD (3) 74:10,11,13 FDA (7) 93:11,12,12,15,17; 94:2;130:2 features (1) 87:3 fecal (1) 99:22 fed (3) 49:13;67:14;93:7 feed (11) 45:17,18;47:25;49:8, 19;50:8;74:4;82:11; 93:2;98:14;115:11 feeding (5) 35:11,15;50:23; 60:12;124:14 feel (6) 9:22;79:5;99:22; 102:14;112:11;114:2 feeling (1) 103:10 felt (1) 43:1 fence (1) 26:25 few (4) 102:15,17;110:7; 123:11 fiber (1) 122:14 field (2) 15:21;111:19 figure (2) 23:5;51:23 figured (1) 48:2 file (2) 18:25;71:1 filed (8) 8:9,12;63:18;66:4,7, 10;124:5,8 filler (1) 56:22 filter (1) 119:13 final (1) 100:3 finally (1) 129:12 Finch (5) 14:8,11,12,13,18 find (11) 28:16;31:1,21;32:12; 47:12;52:8;54:11; 103:5,13,13;112:5 Finding (1) 105:22 fine (4) 63:9;69:16;81:10;
--	---	---	--	--	--

H

health (6) 13:13;24:2;27:23; 54:6;98:8;100:15	12:24;51:8;55:2	85:2	68:20;69:5;71:16; 80:21;93:5;112:4	7:22;24:13,19;25:17; 28:19;30:5;32:2;35:16; 45:11,19;55:11,12; 60:23;63:24;64:3,15; 73:13,14;81:10;82:22; 93:22,23;99:2;108:13; 111:15;113:23;119:22; 123:18
healthy (8) 42:11;78:18;86:14, 17:98:9;100:15,16; 131:10	holds (1) 60:15	idea (5) 35:25;64:1;86:6; 90:17;124:23	infused (2) 74:22;98:22	intro (1) 71:18
hear (4) 6:22;7:1;64:12; 116:22	holistic (3) 49:23;50:3,5	identification (8) 6:6;44:10;65:17; 72:6;75:12;79:12; 100:23;119:25	ingredient (15) 56:6;63:11;81:17; 82:7,17;101:5;121:13, 18,20;132:15,15,17,19, 22;133:2	introduce (5) 6:3;65:14;75:8; 79:10;119:22
heard (7) 25:15;37:19;38:12, 12:62;10;82:13;109:14	home (5) 10:13;15:14;16:22; 32:6;59:23	identifying (1) 93:16	ingredients (25) 55:13,23;59:16;63:3; 73:9,22;76:5,11,16,18; 77:11;81:18,23;82:15; 83:2;87:4;89:10; 101:10,10;128:10,14, 20;129:3,7,21	introduced (1) 29:7
heartache (1) 112:15	homes (1) 25:21	III (1) 18:4	insects (1) 62:2	involved (1) 17:1
heartbeat (1) 112:16	honest (4) 9:22;57:14;91:25; 104:3	illness (1) 57:2	insemination (1) 41:11	iron (1) 26:25
heavy (37) 20:4,15;28:8,9; 30:14;57:19,21;58:3; 59:9;63:1,4,10,14,21, 24;64:8,12;88:2,11,16; 89:13,24;91:4,6,15,19; 92:5;97:18;103:16,20; 105:7;122:9,11; 125:15;126:9;127:2,15	Honestly (12) 11:2;22:17;23:6; 29:10;36:7;42:14; 52:22;64:19;68:11; 102:24;119:4,7	illnesses (1) 100:2	inside (4) 28:18;94:24;95:1; 98:22	irrelevant (1) 58:7
held (2) 4:4;16:25	honor (1) 24:14	image (2) 71:24;75:21	insisted (1) 57:6	Island (1) 115:17
help (6) 29:2;30:12;104:10, 11;110:2,21	hood (1) 25:23	images (3) 64:25;72:1;75:24	inspiration (1) 84:4	issue (4) 84:10;87:17;91:8; 120:24
helpful (1) 96:17	hope (2) 73:17;91:24	imagine (1) 60:15	inspirational (1) 84:3	issues (4) 61:8,23;105:6; 110:23
Here's (1) 38:5	hoped (1) 103:1	impaired (1) 7:7	Instagram (1) 19:19	itching (1) 47:14
hexagon-type (1) 74:16	hoping (2) 112:25;113:2	implied (1) 87:14	instance (1) 128:7	iteration (1) 79:13
Hey (1) 60:10	hospital (2) 11:3;96:12	imply (1) 127:5	instruct (1) 7:25	J
hide (1) 63:4	hot (1) 34:7	important (5) 42:5;74:1;86:1,18; 122:7	instrument (2) 94:9,15	
high (6) 11:7,11;13:7;35:14; 43:2;81:12	house (6) 15:10;22:22;23:12; 41:6;85:3;108:20	Inc (1) 4:7	insurance (1) 110:25	Jack (28) 21:20;22:6,10,12,14; 24:23,23;28:14;29:1; 34:4;39:21;40:4;44:2; 45:13;47:12;48:5,7,10; 50:19;72:7;96:4;97:20; 100:1;106:2,12,15; 115:1;120:7
higher (1) 74:12	household (1) 53:5	include (1) 73:15	intended (1) 72:16	Jack's (1) 97:25
highly (2) 94:9,14	houses (1) 10:19	included (1) 129:17	intentionally (1) 89:4	janitor (1) 13:9
hinted (1) 20:12	human (9) 49:19;87:6,19;103:8, 9,15,18,18;129:22	Including (3) 127:15,17,20	interact (1) 27:9	January (6) 39:17;66:20;67:15; 106:3,14,15
hire (1) 106:25	Humane (1) 124:17	inclusion (1) 87:6	interacted (1) 20:3	January-ish (1) 106:1
hired (2) 107:1;110:21	humans (2) 87:14,24	income (2) 115:15,15	interested (1) 81:13	Jasmine (1) 5:11
hiring (1) 71:1	hundred (9) 33:13;34:21,22;52:2, 11;73:5;76:11,15,17	incorrect (2) 68:4,21	interests (1) 10:25	Jeep (1) 115:20
history (1) 13:3	hunt (1) 122:22	independent (2) 15:1;18:1	internal (1) 22:23	Jesse (11) 40:25;41:7,13,15; 115:5,6,11,12;116:3,4, 4
hit (4) 108:14,15,23;109:3	Hut (1) 26:4	India (1) 128:25	internet (6) 20:25;34:10;35:18; 37:23;52:18;93:24	Jesse's (1) 116:1
hobbies (4) 10:25;122:18,20,22	hypothesis (1) 28:22	indicate (1) 6:11	interrogatories (1) 67:21	
hold (3)	I	indicated (1) 6:9	Interrogatory (3) 44:16;67:12;68:20	
		indications (2) 97:3,6	interrupting (1) 24:4	
	ice (1) 73:16	indoor (1) 26:22	into (28)	
	icon (2) 74:16;80:25	industry (2) 13:15;18:8		
	icons (1)	infested (1) 22:24		
		information (9) 9:9;36:21;43:8;		

Jill (24) 21:20;22:6,10,11,14, 19;23:7;24:19,21,22; 39:19,22;40:5;50:19; 71:19;96:2,3,12;97:3, 13;100:1;115:1;121:3, 9	77:7;83:8;85:9; 86:13;113:7 knew (5) 30:19;42:14;55:14; 84:8;131:13 knowing (1) 19:23 known (1) 114:1	114:5,7 lawyer (5) 17:21,22;37:15; 68:15;106:18 lawyers (1) 111:25 lead (10) 42:20;89:20,22;90:3; 91:9;97:4;103:22; 104:25;118:16;119:11	24:19 likely (2) 69:23;92:13 limited (3) 81:6;115:14;127:25 line (4) 57:5,7;90:12;101:3 lined (2) 26:8;27:7 lines (1) 54:4 linked (1) 19:23 list (5) 132:15,16,17,19; 133:3 listed (1) 107:17 listening (1) 77:21 literacy (4) 11:5;24:20;25:14,16 literally (1) 32:11 literate (1) 18:24 little (40) 8:16;11:15,24;13:22; 21:12;25:13;26:9;31:4, 9,14,16;32:20,23; 33:18;35:3;37:18; 42:22;46:13;48:12; 49:23;54:10;73:7; 74:12;75:24;76:20,20; 77:6,8;80:25;85:2,3; 86:8,24;90:19;102:21, 21;108:19;118:2; 124:19;125:8	logo (2) 74:9;86:25 logos (1) 80:25 long (8) 8:13;10:22;14:4; 23:8;34:25;35:8;48:6, 14 longer (4) 30:24;102:18; 104:14;118:3 look (27) 31:19;36:12,15;42:7, 9,23;55:21,22;61:2; 64:24;65:18;72:10; 75:17;79:13;92:7,14; 98:3;99:19,20;100:24; 101:10;120:5;128:7; 130:4,20,22;132:8 looked (17) 34:9,20;36:13,14,18; 37:3;55:13;77:4;81:14; 82:20;94:22;97:18; 98:16,19;108:12,16; 116:24 looking (23) 33:17,19,21,21;34:2; 55:17;59:16;62:17; 71:5,7,8,9;73:4;85:2,6; 86:9;87:23;99:4; 111:15;120:13;122:8, 15;125:12 looks (5) 73:4;85:3;90:18; 99:18;120:9 lost (2) 22:13;80:5 lot (8) 13:15,16;15:5,21; 25:20;26:20;49:25; 88:1 love (4) 24:20,21;26:19;27:9 loved (4) 24:21;112:13,14; 116:24 lovers (1) 131:9 loves (1) 25:24 low (2) 25:23;81:12 lower (2) 76:20;87:4 loyalty (5) 32:19;47:5;49:1; 52:10;53:1 Lucido (1) 57:24
K	L	leads (1) 53:4 leaning (1) 35:13 learn (3) 88:14;105:6,14 leash (1) 27:1 leashes (1) 27:12 least (2) 46:21;118:3 leather (1) 53:3 leave (1) 109:23 led (6) 31:2;35:18;58:16; 59:15;71:1,13 left (4) 72:13;76:20;81:3; 86:9 leg (1) 23:11 legal (3) 8:25;110:20;111:19 lemon (1) 104:11 lemons (2) 104:10,10 less (6) 42:22;46:17;48:8; 52:3;60:17;116:15 lettering (1) 87:11 letters (1) 110:18 level (6) 35:15;47:9;89:6,12; 90:21;105:4 levels (8) 30:14,17,19;97:4,6, 22,24;122:15 licenses (1) 12:25 lid (2) 50:23;60:22 life (6) 10:18;21:19;30:2; 58:25;80:22;107:1 lifted (1) 115:21 likeable (1)	live (1) 34:25 lived (5) 10:18,19;15:11; 115:6,9 lives (1) 108:20 LLC (1) 18:4 located (3) 16:17;40:21;96:16 location (1) 70:19 locations (1) 70:17 Lockridge (1) 4:24 log (1) 33:4 Logan (2) 11:11,11 logical (1) 92:12 logically (1) 90:11	M
Kay (1) 9:1 keep (7) 14:2;19:9;29:2; 50:12;63:13;73:16; 86:14 keeping (1) 114:4 keeps (1) 19:9 Kentucky (13) 83:13,14;84:18,22; 86:13;90:19;101:17, 24;102:5;121:1;125:5; 128:16;129:10 kept (2) 13:18;109:4 kibble (10) 56:13;60:16,17; 87:14;98:25;99:5,7,7; 117:21;128:13 kids (13) 24:20,22;25:20,20, 24;26:2,3,7,13,14,15, 16;55:6 kill (1) 59:3 killed (1) 79:6 kind (13) 13:12;18:5;20:12; 22:16;23:10;34:23; 39:7;42:12,15;57:7; 85:2;99:19;104:24 kitchen (5) 77:8;83:12;84:18,23; 90:19 kitchens (5)	La (1) 11:11 lab (1) 107:15 Label (13) 37:19;42:7;59:8,11; 62:25;113:5;125:12, 13,25;126:22,22; 127:22,23 labels (2) 125:3;127:5 lady (5) 108:19;110:15; 115:7,11,12 Lady's (1) 116:5 lake (1) 123:4 lakes (1) 123:5 lamb (1) 133:19 landscaping (1) 108:10 Large (2) 54:3,8 larger (4) 48:20;72:3,4;86:10 last (17) 16:8;22:11;25:9; 39:18;44:15;46:2,4; 67:12;68:24;69:7,20; 86:9;106:4;118:20; 119:17;123:18,21 lasted (1) 22:21 late (1) 48:3 later (4) 40:5;48:5;96:19; 130:15 laugh (2) 26:17,17 laughing (1) 25:3 lawsuit (14) 8:11;9:16;57:23; 58:2;71:2;88:21;91:23; 107:22,24;112:3; 113:1,2;114:16;124:1 lawsuits (2)		Mackinac (1)	

115:17 Madison (16) 4:5,13;10:17;15:10; 27:3;32:11;70:20; 100:11;104:3,9;116:9, 10,12,13,14;117:11 Madison's (1) 116:25 main (1) 56:6 majority (1) 94:23 Makes (6) 21:11,11;26:20; 55:16;73:18;84:21 making (4) 53:24;75:2;109:16; 131:5 managers (1) 14:1 manmade (1) 103:6 manufacturer (1) 62:14 manufacturers (1) 114:8 many (13) 10:6;21:19;34:21; 43:19;45:2,4,4,6; 46:19;47:8;48:25;49:8; 115:4 March (1) 39:19 mark (5) 6:3;44:7;69:9;71:24; 75:16 marked (10) 6:5;44:9;65:16;72:5; 75:11;79:11,20;80:23; 100:22;119:24 marker (1) 47:19 markers (1) 98:3 market (3) 27:3,4,5 marketing (2) 12:17;17:4 marriage (1) 8:21 married (1) 8:19 Marvin (6) 108:21,23;109:1,8, 10;110:3 Massachusetts (4) 38:4,5;54:12;116:21 material (2) 94:23,25 materials (1) 43:14 maternity (1) 109:22	math (1) 49:2 matter (1) 23:14 matters (1) 110:25 may (23) 7:7;19:23;22:12,14; 26:17;46:4,6,9;52:23; 53:23;54:11;67:8,19; 68:22;78:8;92:5,6,6; 96:4,9;106:16;123:23; 124:15 maybe (8) 18:13;35:9;48:15; 87:12;98:6;106:1; 119:19;125:8 meal (9) 129:16;131:13,15; 132:23,23;133:1,5,12, 21 mean (21) 8:4;18:24;19:11; 21:4;46:23;51:22;60:6; 63:2;67:4;72:18;73:11; 74:4;76:7;77:6;85:18; 86:17;89:19;99:24; 103:10;112:13;113:5 Means (5) 78:18;85:19;122:12; 126:8;130:9 meat (5) 44:4;73:15,16; 132:23;133:5 media (1) 20:13 medical (2) 17:19;79:9 medications (1) 7:7 medicine (1) 17:11 meet (3) 26:10;53:10;83:20 member (1) 68:7 memorize (1) 72:24 memory (6) 7:8;24:15;36:19; 42:16;44:17;123:25 mention (1) 57:10 mentioned (15) 20:12;21:23;31:6; 34:11;44:23;52:7;59:9, 11;60:12;91:20;95:14; 103:1,22;121:13; 122:19 merchandise (3) 13:14;18:2,5 merchandise-related (1) 18:7	merchandising (1) 14:8 mercury (1) 97:7 mess (1) 109:11 messed (1) 19:10 met (1) 106:21 metal (8) 26:24,25;28:8;60:23; 61:15;63:4;99:15; 103:20 metal-free (1) 88:2 metals (36) 20:4,15;28:9;30:15; 57:20,22;58:3;59:9; 63:2,10,14,21,24;64:8, 12;88:11,16,22;89:13, 24;91:4,6,15,19;92:6; 97:15,18,24,25;103:16; 105:7;125:15;126:9; 127:2,6,15 method (1) 111:13 mice (2) 61:25;62:1 Michigan (1) 104:24 middle (2) 73:7;78:15 Middleton (1) 55:2 Mifflin (1) 4:5 might (10) 11:25;17:8;28:11; 66:13;89:25,25;92:18; 97:18,21;120:21 mile (1) 41:6 miles (2) 15:13,14 military (1) 13:16 mill (1) 85:21 million (1) 13:11 Milwaukee (1) 4:9 mind (7) 6:17;13:3;21:12; 39:5;77:23;95:17; 98:24 minimally (1) 87:4 Minneapolis (1) 14:9 Minnesota (1) 10:20	minute (1) 89:5 minutes (7) 8:15;22:21;23:14,15; 95:18;118:3,9 miscommunication (1) 125:9 misled (1) 113:23 miss (1) 24:23 mission (2) 80:10,16 misstatement (1) 72:7 misstates (1) 121:16 mistaken (1) 68:22 misunderstood (1) 66:13 mix (2) 35:6;82:3 mixed (1) 35:5 Mm-hmm (16) 21:24;22:15;28:6; 40:7;52:1;54:1;60:14; 68:16;72:17;73:3; 114:13;117:24;122:21; 125:20;128:2;132:18 M-O-B-I-L (1) 5:18 MobilEssentials (2) 16:8;18:20 moist (1) 99:10 mold (1) 61:20 moldy (1) 73:21 molecule (2) 91:4;105:2 molecules (2) 89:13;90:22 moment (2) 79:2,3 monitor (1) 114:10 month (5) 46:3,20,21;66:19; 105:24 months (3) 28:20;48:9;130:15 more (12) 34:6;47:21;56:11,20; 78:12;92:13;93:21; 109:9,12;119:21; 121:23;129:10 morning (9) 4:1;5:6,7;15:14; 22:20;49:11;96:3; 110:17;111:15	mortar (3) 52:21;70:14,16 most (2) 43:21;84:22 mostly (1) 15:1 motivated (1) 50:13 motorcycle (1) 14:16 Mounds (26) 31:14;32:10,12,18; 33:3;47:5;49:1;52:6,8, 9,12,20,25;53:2;54:17; 55:4,8;66:21;69:5,20, 20;70:6,11,23,24;98:17 mouth (2) 30:6;71:16 move (6) 13:16,20;31:20;73:6; 76:19;86:8 moved (4) 13:17;15:10;101:19; 102:4 much (10) 13:18;30:4;48:20,23; 53:16;55:6,25;80:21; 117:21;122:13 muscle (1) 23:10 mushy (1) 99:10 must (2) 68:5;80:4 mutton (1) 133:18 myself (5) 6:23;7:24;36:17; 53:7;75:16
N				
	name (16) 4:11;5:8;6:9;8:23, 25;11:18;18:3;22:17; 25:2;29:11,16;41:1; 94:5,7;96:12;131:1 named (1) 124:6 names (6) 21:18;40:23;42:8; 45:4;81:21;96:10 narrative (1) 66:1 nasal (3) 22:18;28:17;116:2 N-A-S-C-H (1) 14:11 Nash (8) 14:8,10,10,11,12,13, 15,18 N-A-S-H (1) 14:11			

<p>National (2) 16:20,21</p> <p>natural (4) 72:19;74:22;88:18,19</p> <p>naturally (4) 88:11,16;89:17;127:11</p> <p>nature (2) 64:17;72:16</p> <p>Nauen (1) 4:24</p> <p>Nautilus (1) 116:20</p> <p>necessarily (2) 20:25;37:12</p> <p>need (9) 6:25;7:4;24:12;26:6;79:24;92:21;93:18,20;110:3</p> <p>needed (1) 114:15</p> <p>negative (2) 37:11,24</p> <p>neighbor (1) 25:10</p> <p>neighborhood (1) 15:11</p> <p>neighbor's (1) 108:8</p> <p>Nestle (1) 57:24</p> <p>New (18) 10:20;15:5;46:5,14;83:4,5,9,15,22;84:2,8,11,13,20;96:24;115:20;116:22;128:11</p> <p>news (1) 8:4</p> <p>next (9) 14:6,19;19:13;46:11;47:9,11;51:10;84:18;110:4</p> <p>niche (1) 77:7</p> <p>night (6) 24:10;25:9;61:1,5;96:13;118:25</p> <p>nine (1) 25:18</p> <p>noes (1) 7:4</p> <p>noise (1) 92:8</p> <p>Non-foods (1) 13:13</p> <p>Nope (2) 13:1;114:25</p> <p>normal (1) 98:11</p> <p>Northern (1) 57:23</p> <p>nose (2)</p>	<p>28:18,20</p> <p>notes (1) 118:4</p> <p>notice (2) 78:3;120:23</p> <p>noticed (1) 120:21</p> <p>Nourish (1) 72:16</p> <p>nowadays (2) 19:5;82:1</p> <p>nuh-uhs (1) 7:3</p> <p>number (6) 4:10;38:6;44:16;67:13;75:15;117:1</p> <p>numerals (1) 18:4</p> <p>nutrient (1) 30:2</p> <p>nutrients (1) 30:2</p> <p>nutrition (6) 12:4;17:14;20:10,21,22;73:5</p> <p>nutritional (9) 30:10;55:17,21;59:5;72:19;81:16;125:11,17;126:3</p> <p>nutritious (2) 73:1,2</p>	<p>66:21;67:2,8,16</p> <p>Odyssey (2) 41:6;42:1</p> <p>off (13) 21:17;32:25;35:2;39:11;62:17;65:9;95:20;96:6,6;118:10;120:2,3;134:1</p> <p>office (1) 13:21</p> <p>officer (2) 10:11;109:17</p> <p>official (1) 124:24</p> <p>Officials (1) 82:11</p> <p>offspring (2) 40:8,13</p> <p>often (1) 50:8</p> <p>Ohio (1) 129:8</p> <p>Oklahoma (1) 10:20</p> <p>old (14) 10:8;22:4;25:12;34:24;35:1;40:1;96:25;115:7,13;116:4,4,6,12,13</p> <p>omegas (1) 122:10</p> <p>once (5) 9:13;43:21;50:18;66:19;115:21</p> <p>One (51) 11:4;19:23;22:18,19;26:5,9;30:20;32:12;37:1;40:9;43:1;46:21,23,23,25;47:2,2,3;49:5;50:25;52:2,23;54:5;69:5;81:2;85:2;90:25;91:4,20;98:16;99:18;101:8,17,17;105:2;107:8,9;109:8,24;116:13,15,15,25;117:1;119:6,21;120:13;122:9,11;126:20;133:8</p> <p>ones (1) 117:3</p> <p>one's (1) 42:22</p> <p>online (6) 8:6;52:21,23;70:15;71:5,15</p> <p>only (21) 10:2;34:9;35:19;38:2;41:2;43:8;47:2;52:9,20;54:23;55:22;70:17,21,23,25;78:19;89:25;93:6;98:24;101:23;121:6</p> <p>opened (1) 50:23</p>	<p>opinion (18) 41:15;43:6;54:20;56:21;79:8;80:17;84:22;88:9,17;89:12;90:16,18,21;94:2;97:10;104:20,21;125:15</p> <p>opportunity (1) 59:3</p> <p>order (2) 26:7;53:2</p> <p>ordered (1) 53:3</p> <p>ordinary (1) 100:1</p> <p>organizations (2) 94:3,5</p> <p>organs (2) 22:23;76:24</p> <p>original (3) 33:15;66:3;68:8</p> <p>Orijen (24) 36:14;37:4;42:6;43:20;44:21,21;47:10;48:7;55:8;59:3,6;61:8;62:18;71:10;73:1;76:3;77:11;86:13;87:3;96:6;99:21;102:9;123:22;124:9</p> <p>others (2) 5:20;117:8</p> <p>otherwise (3) 77:15,16;79:2</p> <p>out (34) 14:14;16:22;23:5;28:16;32:11;36:22;47:12;48:2,5;52:7;54:11,24;60:19;61:3;62:19;90:11;94:18,23;95:9;100:1;103:13;104:8,11,13;106:19;107:6;108:9,12,16;109:22;112:5;116:20;119:21;123:3</p> <p>outcome (2) 112:25;113:2</p> <p>outdoor (1) 26:22</p> <p>outside (6) 11:1;26:4;27:5;50:10;95:4;114:18</p> <p>outsource (1) 86:5</p> <p>outsourced (6) 85:5,18,25;129:13,18,20</p> <p>over (23) 6:16;11:23;13:2;17:7;30:23;31:13;34:21,21;35:3,7,13;50:1;55:3;65:18;66:12;76:3;78:8;87:25;94:2;108:19;115:24,25;</p>	<p>121:11</p> <p>own (4) 16:4;17:23;35:22;79:8</p> <p>owned (1) 17:23</p> <p>owner (2) 16:5;112:14</p> <p>owners (1) 112:13</p>
				P
				<p>pack (1) 78:6</p> <p>package (10) 43:4;55:18;76:3;78:3,9,12;80:20;113:5;114:1;132:20</p> <p>packages (1) 113:6</p> <p>packaging (9) 43:3,9;59:14,17;65:1;78:6;82:15;86:7;92:10</p> <p>page (12) 44:14;66:14,23,24;67:11,20;75:21;80:7;81:18;91:7;101:6;130:20</p> <p>pages (2) 65:21;107:9</p> <p>paid (3) 117:2,2,3</p> <p>pamper (1) 115:10</p> <p>pampered (1) 26:24</p> <p>panel (7) 81:17;82:7,17;101:5;121:13,19,21</p> <p>paper (3) 37:6,7,9</p> <p>papers (2) 8:8,10</p> <p>paperwork (1) 7:17</p> <p>paragraph (4) 66:15,24;86:10;87:9</p> <p>parents (1) 27:19</p> <p>park (1) 25:9</p> <p>part (2) 16:8;91:1</p> <p>participate (1) 19:7</p> <p>particular (6) 18:16;21:5;29:22;32:14;49:24;114:11</p> <p>parties (4) 25:25,25;26:1,2</p> <p>party (2)</p>

<p>129:18,20 passed (17) 22:5,10,11,19,22; 24:7;28:4;96:2,3,4; 98:5;99:6;100:2; 106:15;109:19,21; 111:24 passing (1) 23:19 past (1) 109:19 patio (1) 108:11 pay (3) 21:1;109:5,17 peels (1) 120:3 pentobarbital (18) 20:8,19;28:11;58:11; 63:21;64:5,9,20;92:18, 23;93:3,8;94:10;126:1, 18;127:20;129:22,25 people (22) 13:14,25;18:14;21:9; 25:2;27:7,9;40:12; 42:18,20;53:11;86:2; 92:16;93:25;94:4; 99:13;104:6,21,21; 112:6,8,12 Pepsi (3) 90:2,2,3 per (3) 46:19,21;91:1 perceived (1) 51:14 percent (6) 55:23;73:5;76:11,15, 17;118:5 percentages (3) 82:18;121:25;122:8 perform (1) 23:4 period (1) 49:15 person (2) 77:7;93:1 pet (45) 10:2;17:13;18:11,13; 20:10,21;26:15;29:13, 14;31:3,13,15,18,19, 22;32:6,19;38:10,14; 41:13,15,20;52:6; 63:16;66:21;67:4;69:5; 78:8;82:2;92:17;93:4, 6;99:13;102:25; 111:16;112:13,14,14; 114:8,24;115:24; 124:9;126:8;128:5; 131:9 PETERSON (68) 4:23,23;6:1;7:21;9:7, 12;23:20,24;40:17; 51:20;58:6;60:3;61:22;</p>	<p>64:14;65:25;68:13,17; 69:2,16,22;70:3;71:13; 74:14;75:14;76:12; 78:5;79:17,21,24;83:6; 87:16;90:15;93:13; 94:12,19;95:18;96:18, 21;97:9;101:2;104:19; 105:10,22;106:5,10,18; 112:24;113:19;116:3; 117:24;118:8,23; 119:2;120:12,16; 121:16;123:11,14,17; 127:19;132:2,5,9,11, 13;133:8,10,24 Petfoodindustrycom (1) 38:16 Petfoods (3) 4:7,19,22 pets (3) 112:14;115:10; 127:14 PetSmart (4) 70:13,14,19,21 pharmacies (1) 15:1 phenobarbital (1) 63:14 phone (3) 16:3,11;38:6 phrase (7) 72:18;73:11,22;76:2; 81:9;82:24;85:22 pick (7) 54:9;55:3;99:9,14, 15,17,17 picked (1) 31:25 picking (2) 99:8,13 pickups (1) 99:10 picture (1) 36:18 pictures (2) 27:8;36:16 piece (1) 61:15 pieces (2) 61:13;89:25 pile (1) 32:5 pizza (7) 26:1,3,4,4,10,11,12 pizzas (1) 26:7 placed (1) 92:12 Plaintiff (5) 4:25;9:16;66:18; 67:14;107:22 Plan (4) 55:11;117:14,15,20 plant (1)</p>	<p>64:2 Plastic (8) 51:3,6,8;60:16; 61:11,13;94:25;95:1 played (1) 23:8 plays (1) 25:12 please (28) 4:14;5:8;6:19,22,25; 7:2;8:2;14:10;40:19; 44:13,14,20;65:18,19; 66:14,16;67:11,20; 72:3;75:20;80:7;82:6; 96:2;130:21;132:14, 16,25;133:2 Plymouth (1) 116:20 point (11) 28:19;64:15;78:6; 98:6;100:6;104:12,16; 119:10;121:3;124:4; 126:20 pointing (1) 75:25 poisoning (1) 28:8 police (5) 10:10,11;108:25; 109:17;110:14 political (1) 21:10 pontoon (2) 123:2,3 Portage (1) 40:22 portrays (1) 126:11 position (4) 14:4,6;90:25;91:3 positions (1) 16:25 possibly (1) 71:10 posting (1) 20:13 posts (1) 20:3 poultry (4) 34:8;44:5;47:20,25 pounds (8) 47:8;56:5;76:4; 77:22,22,23;78:2;98:9 Prairie (1) 55:1 Pre (1) 54:8 precise (1) 77:4 premium (2) 43:2,2 prenatal (1) 41:9</p>	<p>prepare (3) 7:11,12,15 Prepared (3) 85:9;86:12;114:13 preparing (2) 36:20;90:20 presence (1) 94:10 present (2) 6:11;93:4 pressure (1) 23:15 pretty (3) 18:21;55:6;122:13 prevent (1) 112:15 previously (1) 67:18 prey (2) 76:21;77:2 price (3) 34:20;53:18;86:21 prices (1) 51:12 Prince (29) 21:21;22:8;24:17,18, 24;25:3,4,5,6,7;27:22; 39:24;41:5;46:11; 53:25;59:18,23;60:11; 72:1,8;98:5,8,10; 100:13,25;101:11; 115:1;116:8;121:3 print (4) 43:14;81:11;87:12; 92:14 printouts (1) 72:3 prior (1) 87:6 privilege (2) 7:25;64:16 Pro (4) 55:11;117:14,15,20 probably (28) 11:2;16:16;20:22; 23:14;34:25;35:3,9; 45:10;46:21;48:3,8; 51:24;52:2,3;60:10; 65:2;68:17;82:22; 85:16;87:11;93:21,24; 99:4;101:8;106:1; 115:12;118:7,20 problem (7) 28:17;75:6,7;93:16; 104:24;105:20;112:21 problems (2) 27:25;104:22 proceed (1) 4:16 proceeding (1) 110:12 process (2) 15:8;110:20</p>	<p>processed (1) 87:4 processes (1) 75:2 procurement (2) 13:10,24 produce (3) 73:14;86:3;101:16 produced (7) 31:24;73:13;102:4; 120:25;121:1;128:19; 129:11 producer (1) 88:23 producing (3) 78:22;86:2;101:19 product (16) 13:11,12;14:3;31:17; 73:12;83:2;85:23;86:5; 88:9,20;92:1;103:5; 112:19;114:2,3;131:6 products (3) 16:14,14;124:10 professionals (2) 94:3,7 program (5) 32:18;47:5;49:1; 52:10;53:1 Project (1) 37:20 promoted (1) 13:18 Promotions (5) 14:22,25;15:3,20,23 proof (1) 79:9 properly (2) 31:17;32:3 property (1) 109:3 prospecting (1) 15:5 protein (5) 56:6,20;81:12,14; 82:19 Protein-rich (1) 81:6 prove (5) 89:1;110:5;113:8,11, 12 proves (1) 113:14 provide (3) 69:8;96:11,18 Providing (1) 112:4 publication (1) 124:25 pulled (1) 23:10 puppies (7) 29:14,15;30:11,12, 20,24;41:9</p>
---	--	---	---	---

<p>puppy (19) 29:16,20,23,25;30:1, 5,15,18,22;35:2,5; 45:11,17;48:19;53:17; 58:25;117:16,17,20</p> <p>purchase (11) 32:13;44:1,25;45:3; 52:9,21;53:5;59:15; 66:12;69:19;131:6</p> <p>purchased (19) 40:4;44:18;45:13; 46:18;52:23;61:9; 64:25;66:18;68:24; 71:25;72:11,22;75:17; 77:3;79:14;87:9;101:6; 124:9;131:12</p> <p>purchases (3) 52:18;68:4;69:7</p> <p>purchasing (22) 44:22;45:8,15,24; 48:4;53:22;67:4;70:5, 11,12,14,19;77:17; 78:10;81:9,13;82:7; 100:25;102:9,15,19; 113:23</p> <p>Purebred (2) 22:1;115:7</p> <p>Purina (23) 54:3,5,8;55:5,11,25; 56:7;57:25;58:2,8,11, 16,18;59:1,6,8,11,14, 19;70:5,11;117:15,19</p> <p>Purina's (1) 57:19</p> <p>purport (1) 113:16</p> <p>purposed (1) 73:23</p> <p>purposing (1) 86:15</p> <p>put (25) 9:8;23:25;24:2; 29:22;30:1;31:14;33:2, 3;35:16;47:21;51:10; 52:25;57:21;58:13; 60:17;63:16;68:6,13; 89:6;92:5,13;98:22; 99:16;103:2;106:5</p> <p>puts (1) 61:4</p> <p>putting (3) 73:15;103:9;108:10</p>	<p>R</p> <p>Racine (2) 14:20;15:13</p> <p>raised (1) 124:20</p> <p>ran (1) 108:18</p> <p>Rapids (1) 14:14</p> <p>rather (1) 23:7</p> <p>ratios (1) 33:22</p> <p>raw (16) 59:24,25;73:9,11,12, 15,16,23;76:4,7,16,18; 87:3;98:15,19,21</p> <p>rawhide (4) 49:25;50:1,2;95:7</p> <p>reached (1) 106:19</p> <p>read (50) 7:16,17;11:5;25:16; 26:14;43:8,11,14; 44:20;66:16,17;67:1, 11,17,18;72:2,21,23, 24;73:22;74:21,24; 76:2,5,25;80:13,21; 81:7;82:6,8,17;83:25; 84:7;85:8,12,13;86:16; 87:2,7,9,11,18;91:18; 92:15;121:13,18,20; 132:14,19;133:2</p> <p>reading (7) 26:15,16;59:17; 66:23;88:15;90:18; 113:25</p> <p>ready (2) 44:14;65:19</p> <p>real (1) 121:9</p> <p>realize (1) 113:3</p> <p>really (3) 34:4;41:12;42:19</p> <p>reason (9) 29:22;72:2;77:10; 78:23;79:7;80:15;86:4; 117:4,7</p> <p>Rebecca (5) 4:23;24:6;114:12,18; 123:10</p> <p>recall (29) 7:8;12:14;18:16; 29:16;34:16;35:24; 44:22;45:23;47:7,9; 48:1;53:16;54:13,15; 56:9;63:20;64:19; 71:22;75:1,4;97:23; 102:12;107:3,18; 117:15,17;124:6;</p>	<p>128:1;132:24</p> <p>recalled (2) 93:18,20</p> <p>receipt (1) 33:1</p> <p>receipts (3) 33:7,14;47:3</p> <p>receive (1) 11:21</p> <p>received (5) 17:13,16;31:16; 34:11;49:5</p> <p>recently (6) 21:20;42:16;43:23; 98:10;116:14;119:19</p> <p>Recess (4) 39:13;65:11;95:22; 118:12</p> <p>recognize (1) 44:11</p> <p>re-collect (1) 39:8</p> <p>recommend (3) 29:23;47:23,24</p> <p>recommendation (3) 34:12;42:4;58:14</p> <p>recommendations (4) 31:6;42:1;58:15; 59:17</p> <p>recommended (7) 18:11,13;29:9;30:8; 41:13,20;54:14</p> <p>record (17) 4:2,15;5:8;9:8; 23:25;24:5;39:12,15; 44:20;65:10,13;95:21, 24;106:5;118:11,14; 134:1</p> <p>recovery (1) 15:8</p> <p>rectangle (3) 72:15;84:2;86:24</p> <p>Red (25) 44:21;46:25;47:1,7, 11;48:11,13,23;51:1; 71:12,25;72:14;73:1; 80:24;84:2;93:9; 108:21;120:6;121:4; 125:16;128:7,10; 129:17;131:12;133:3</p> <p>referenced (1) 125:2</p> <p>referring (2) 8:8;107:9</p> <p>refresh (2) 44:17;123:25</p> <p>refrigerate (1) 73:17</p> <p>refrigerated (2) 130:12,18</p> <p>refrigerator (1) 98:18</p> <p>regarding (2)</p>	<p>91:19;124:1</p> <p>region (6) 83:2,15,19,22,23; 128:15</p> <p>Regional (43) 44:21;46:25;47:1,7, 11;48:11,13,23;52:13; 71:12,25;73:1,8;80:24; 82:25;83:4,9,11,12,17, 18,21;84:5,22;93:9; 120:6;121:4;125:6,16; 127:25;128:6,7,10,14, 20,25;129:3,7,17; 131:1,2,12;133:3</p> <p>regionally (1) 83:3</p> <p>regular (3) 30:3;35:5;115:13</p> <p>regularly (4) 95:14;103:12;119:1, 17</p> <p>regulated (1) 129:25</p> <p>Reitman (1) 68:10</p> <p>related (2) 20:14;114:5</p> <p>relates (1) 126:16</p> <p>relation (1) 27:17</p> <p>relevance (3) 24:1;61:22;119:3</p> <p>relevancy (4) 60:4;93:14;94:20; 101:3</p> <p>reliability (1) 62:13</p> <p>relied (1) 131:5</p> <p>remember (9) 22:17;26:5;36:7; 50:3;54:6;71:19; 102:11;124:13;129:14</p> <p>rep (1) 124:6</p> <p>repeat (2) 6:23;105:18</p> <p>rephrase (1) 6:20</p> <p>reported (1) 14:1</p> <p>reporter (4) 4:15;7:1,5;120:3</p> <p>Reporting (1) 4:12</p> <p>represent (2) 76:10;112:8</p> <p>representative (3) 111:3,5,10</p> <p>represented (1) 5:24</p> <p>reputable (2)</p>	<p>31:11;109:7</p> <p>requires (1) 69:20</p> <p>research (11) 30:5;31:4,9;33:16, 18;34:11;35:18;55:10, 12;58:8,11</p> <p>researched (1) 54:10</p> <p>reside (1) 10:13</p> <p>resided (1) 10:22</p> <p>resort (1) 115:18</p> <p>respond (2) 7:3,4</p> <p>response (3) 66:11;67:12;123:8</p> <p>responsibilities (2) 13:23;14:9</p> <p>responsibility (1) 16:15</p> <p>responsible (2) 13:10;114:13</p> <p>restaurant (1) 60:9</p> <p>restitution (3) 109:16;110:1,4</p> <p>results (2) 107:4,12</p> <p>retriever (3) 25:1;115:6;116:11</p> <p>retrievers (2) 22:1;27:9</p> <p>review (11) 9:13;63:17;66:3,6,9; 77:2;81:9,18;85:14; 86:15;101:5</p> <p>reviewed (4) 65:21;81:20,23; 113:5</p> <p>reviewing (1) 8:14</p> <p>rewarded (1) 50:9</p> <p>RF (1) 86:25</p> <p>ride (1) 115:23</p> <p>ridiculous (1) 122:2</p> <p>right (36) 6:16;21:11,16;22:4; 23:21;24:24;27:24; 39:3,10,19;50:15;56:8; 59:19;64:24;65:6; 71:18,23,23;74:10,12, 16,21;78:14;80:3; 86:21;95:17;101:11; 108:6,13;110:12; 116:9;117:25;119:21; 123:6;126:24;133:25</p>
<p>Q</p> <p>qualities (2) 33:20;34:1</p> <p>quality (2) 51:13,15</p> <p>quick (1) 39:4</p> <p>quickly (1) 19:14</p>				

right-hand (2) 85:1;122:4	save (1) 52:11	sense (4) 21:11;11;26:20; 84:21	73:20;108:11	22:15;25;23:17; 24:12;63:6;75:15;80:4; 81:24;120:1,16;132:9
risk (5) 125:14,23,25; 126:14,17	saving (1) 33:14	sensitive (2) 54:7;94:15	situated (1) 112:8	sort (3) 17:5;23:4;38:8
rock (1) 32:4	savvy (1) 18:21	sent (3) 7:18;109:12;110:7	situation (1) 9:20	source (8) 28:23;56:6;57:1; 84:3,4;103:13,14; 116:23
rocked (1) 108:14	saw (9) 15:25;40:23;41:2; 71:5;78:9;103:23; 108:12;111:16;119:16	sentence (8) 44:15;66:16;67:1,12; 83:25;85:8;86:9;87:2	Six (40) 31:7,10;32:25;34:5; 19:36;24,25;44:2,21; 46:24,25;48:7,8,10,12; 21:50;20,25;51:25; 52:13;56:1;62:21,22; 71:10;78:6,19,21; 79:14;82:24;93:9; 121:6,7,10;125:6,16; 127:23;128:9;129:18; 132:16,20	sourced (11) 83:2;84:8,11,13,17; 88:9,24;90:10;105:19; 113:7;127:12
role (7) 13:23;15:3,18;16:10; 18:20;24:19;112:2	saying (17) 7:2;33:2;68:22;83:7; 87:22,23;88:2,4,21,24; 89:2,3;90:8;93:25; 103:4,19,19	separate (2) 50:22,24	size (2) 56:4;72:1	sources (1) 116:23
roll (1) 51:9	scary (1) 23:17	served (3) 110:13,15,16	slept (1) 24:10	sourcing (4) 93:16,25;113:17,21
Roman (1) 18:4	school (15) 11:4,8,11,14,15,18; 13:6,7;24:20;25:18,19, 20;26:3;28:16;50:12	service (1) 100:8	slimy (1) 99:19	Spaniel (1) 115:8
room (1) 71:20	schooling (1) 11:25	set (3) 51:12,12;102:21	slopping (1) 77:9	spare (1) 115:16
rope (3) 94:23;95:6,6	schools (2) 12:22;25:17	settled (1) 110:5	small (9) 47:7;52:12;92:13; 108:5,6;110:10,11,23; 115:14	Spartan (2) 14:14,15
rotate (1) 31:17	science (1) 12:12	several (3) 27:21;70:24;111:14	smaller (4) 47:1;60:18;87:12; 117:21	speak (2) 6:23;7:16
routine (1) 89:9	scientific (1) 91:14	shape (1) 74:17	snicker (2) 26:17,18	special (2) 53:2,3
Roy (1) 34:24	scoop (3) 35:16;60:23,23	share (1) 79:25	social (1) 20:13	specialist (1) 100:9
rubber (1) 95:7	scooper (1) 95:11	sheets (1) 18:6	socialize (1) 27:7	specific (12) 9:9;18:18;30:9;31:2; 32:7,24;49:22,22;54:5, 15;78:20;122:14
rules (1) 6:17	Scott (4) 4:6,25;5:1,9	Shop (1) 38:4	Society (1) 124:17	specifically (11) 29:15;33:19;34:2; 36:22;58:24;63:1,3; 71:7;124:13;125:12; 127:25
run (5) 24:22;38:10;52:7; 57:17;109:3	seal (2) 31:22;51:9	shops (1) 109:7	socks (1) 18:6	specifics (1) 24:13
running (1) 25:11	sealed (8) 31:12,25;32:3;74:5; 102:16,19,25;120:20	show (2) 43:17,18	Sold (3) 15:1,24;102:4	speculation (3) 51:21;76:13;90:16
runs (1) 61:5	sealing (3) 102:2,8,10	shows (1) 15:6	somebody (6) 29:23;32:5;85:20; 89:3,20;92:14	spell (2) 14:10;40:19
S	seal (2) 31:22;51:9	shut (2) 104:4,5	someone (2) 111:9;112:15	spend (2) 8:13;48:20
	search (7) 19:24;31:1;38:2; 42:14;54:25;57:19; 69:21	siblings (2) 27:18;98:5	Sometime (1) 48:3	spent (2) 28:16;51:16
sad (1) 22:25	searches (5) 35:22;71:8,9,13,15	sic (1) 63:14	sometimes (3) 32:10;70:9,10	spoke (2) 7:18;106:21
safe (2) 94:11;104:14	searching (1) 71:3	sick (3) 40:24;58:20;104:22	somewhere (2) 85:21;88:15	spoken (1) 114:22
sale (2) 17:2;52:25	second (12) 14:11;65:22;66:9,14, 16;75:20;80:7;81:18; 101:6;107:3,6;130:20	side (2) 85:1;122:4	son (4) 10:12,15;14:16;15:7	spokesperson (1) 9:25
sales (4) 14:24;15:4;16:5,25	seeing (6) 75:1;93:25;97:23; 119:17;124:1;132:24	signature (1) 67:23	Sondel (2) 40:25;41:7	sports (1) 54:6
Same (30) 5:13;14:9;15:11,21; 25:18;27:20,20;29:18; 32:13;39:20;53:11; 59:22;64:4,7;83:15; 89:18;91:7;101:8; 105:15,16,17;116:17; 117:4,7,12;125:17,22, 24;131:15,23	section (1) 86:22	signed (1) 106:25	sons (2) 10:7;18:4	spot (1) 92:12
samples (1) 98:1	sell (1) 14:25	silly (2) 90:4;104:8	sophisticated (1) 94:9	spots (1) 34:7
sanitary (1) 90:19	selling (3) 16:2,10;18:1	similar (2) 16:14;72:11	Sorry (11)	spouse (2) 10:1,14
Saturdays (1) 27:4		similarly (1) 112:8		spouse's (1)
		sisters (1) 40:13		
		sit (1) 96:22		
		sitting (2)		

8:23 spray (1) 62:4 spread (1) 116:2 spring (1) 123:19 square (5) 27:6;50:16;76:21; 88:1;122:6 squares (1) 32:23 squeaker (2) 95:1,5 squeakers (1) 94:24 stack (1) 31:19 staff (1) 13:25 stainless (3) 60:24;95:9,12 stale (1) 73:21 stamp (1) 92:5 standards (2) 91:15,18 standing (2) 24:3;35:12 stands (1) 82:12 staple (1) 33:1 start (8) 21:17;25:3;30:1,25; 93:24;104:21;108:23; 110:10 Started (15) 13:7;16:2;23:11; 40:24;46:12;50:18,19; 53:23;71:3,5,7;92:19; 105:19;110:11;111:15 starting (2) 108:8,22 starts (1) 86:24 state (5) 4:14;5:8;91:25; 103:7;126:23 stated (3) 46:8;111:14;125:19 statement (2) 72:15;73:8 statements (2) 62:19;121:12 state-of-the-art (1) 97:2 States (3) 4:8;67:14;101:20 station (5) 35:11,15;50:23; 60:12;124:14	stay (3) 40:11,12;125:4 steel (2) 95:9,12 stepfather (1) 111:22 stepped (1) 24:24 sticker (1) 33:2 still (8) 22:8;24:21;42:23; 60:5;87:23;88:18; 89:14;90:22 stipulations (1) 40:9 stomach (1) 35:6 stomachs (1) 32:16 stood (1) 62:19 Stop (4) 38:4;56:23;62:14; 78:21 stopped (5) 45:23;53:22;102:2; 10;119:19 store (10) 31:13;38:4;42:17; 51:4;52:21;53:10; 66:21;70:25;98:17; 102:25 stores (9) 13:14;14:3;16:16,17; 32:12;52:14;54:25; 70:24;114:24 Street (1) 4:5 strict (1) 47:21 Strictly (1) 12:15 strong (4) 23:18;80:11;86:15, 17 stronger (1) 56:21 struggling (1) 23:9 study (1) 11:16 stuff (7) 19:11;41:11;42:15; 87:24;88:10;113:8; 118:4 subject (2) 21:15;67:13 submit (1) 32:22 substance (1) 105:2 sudden (1)	23:7 suddenly (1) 22:19 Sue (1) 124:17 suing (2) 58:2;63:20 suit (1) 108:1 Suite (1) 4:5 Sun (1) 55:1 supplier (3) 130:15;131:15,23 suppose (1) 84:24 supposed (2) 37:16;112:7 Sure (16) 21:14;32:3;36:21; 39:6;40:14;42:11; 55:13;69:11;78:12; 86:16;91:6;95:18; 112:13;122:9;123:13; 132:5 Susan (3) 8:24;9:1;53:7 swear (1) 4:15 SWeaver@mobil (1) 5:18 switch (4) 30:22;53:24;90:1; 96:6 switched (5) 29:10;35:2;41:5; 46:15;54:3 sworn (2) 5:2;68:20 system (1) 69:21	tech (2) 18:21,25 teeny (1) 49:23 telling (9) 19:9,10;30:7;55:22; 77:13;78:25;82:5; 109:4;127:10 temperatures (1) 87:5 ten (3) 77:20;78:8;118:3 term (5) 25:15;63:5;127:24; 128:6;129:13 terms (2) 82:15;133:12 terrifying (1) 28:21 test (4) 103:12,12;107:4,12 tested (3) 97:12;100:8;113:9 testified (5) 5:3;123:20;126:25; 127:2,3 testifying (1) 68:19 testimony (2) 121:17,17 testing (14) 10:9;23:5,6;89:1,5,9; 90:9;98:4;103:5; 113:12,13,14,21; 127:13 tests (1) 57:17 texted (1) 110:3 texts (1) 110:8 That'll (1) 110:2 therapy (3) 11:3;100:7,10 thereabout (1) 71:4 thinking (1) 19:24 third (2) 129:18,20 though (3) 90:2;115:25;130:18 thought (9) 23:10;28:4;31:10; 62:21;88:19;91:20; 123:22;125:18;131:10 thoughts (1) 39:8 thousands (2) 28:16;56:25 Three (26) 10:7;14:5;21:22;	22:2,3;26:21;27:8,17; 29:5,18;33:13;35:11, 15;41:3;46:22;49:2,2, 4;53:4,11;85:1;99:9; 109:7;115:14;117:2; 118:21 three-fourths (1) 75:23 threw (6) 23:12,13;46:4,8; 124:14,18 throughout (1) 78:7 Throw (3) 57:8;99:16;124:18 thrown (1) 95:3 ticket (1) 109:3 tickled (1) 26:10 times (16) 26:6;32:7;43:19; 48:25;49:4,8;51:23,23; 52:3;78:20;105:12; 111:14;117:2;118:17; 124:21;130:6 tissue (1) 97:25 tissues (1) 97:17 titled (1) 11:4 today (14) 5:24;6:12,17,25;7:7, 11,12;24:15;36:20; 63:8;68:19;110:17; 123:7;127:24 Today's (1) 4:2 together (2) 35:17;53:9 to-go (2) 60:9,10 told (10) 22:22;23:1;32:8; 47:19,24;78:19;89:23; 94:13;98:14;109:1 took (6) 15:12;24:11;28:15; 33:6;35:8;96:12 top (5) 62:17;72:13;80:7; 85:1;86:10 total (3) 45:2;51:16;53:20 totally (3) 35:7;82:8;99:11 touch (2) 40:11,12 tough (1) 57:15 towards (2)
T				
tags (1) 61:11 talk (10) 24:14,17,22;37:10; 55:8;77:21;103:4; 114:12;124:19;130:5 talked (11) 16:24;20:22;21:12; 34:15;54:12,17;55:4; 57:5;86:22;114:16; 122:18 talking (4) 47:5;87:21;91:7; 113:16 tallow (2) 131:13,16 target (1) 18:9				

73:7;112:11 town (1) 31:14 Toxicology (2) 12:10;17:17 toxin-free (1) 88:6 toxins (2) 127:3,8 toy (3) 95:2,2,4 toys (2) 94:16,17 track (1) 114:4 trade (7) 11:13,15,18;12:22; 13:6;43:17,18 Train (2) 131:16,18 trained (1) 17:21 training (5) 17:8,13,16,19;49:24 transcript (1) 9:14 transition (5) 29:3;35:4,8;46:11; 48:10 transitioned (1) 46:13 transitioning (2) 48:17;120:24 transitions (1) 13:17 trash (1) 95:3 Traurig (1) 4:18 travel (1) 15:4 treat (3) 50:11,14;59:22 treats (11) 49:21,22,23,23,24; 50:3,5,6,8,17;59:21 tripe (1) 74:22 trouble (1) 32:8 troubled (1) 25:21 truck (6) 108:13,14,14,16,21, 24 true (1) 78:11 trust (2) 93:18;130:23 trusted (3) 79:1;130:23;131:9 Truth (2) 38:14;67:25	truthful (1) 103:11 truthfully (1) 7:9 try (3) 29:12;33:15;42:7 trying (3) 70:2;120:14;122:1 tubes (1) 60:15 turn (9) 14:2;44:14,15;66:14; 67:11,20;75:20;78:14; 84:25 TV (2) 42:16;103:23 twice (3) 41:2;43:21;49:9 Twitter (3) 19:6,17,24 two (33) 13:7;15:25;22:12; 25:10;28:4;40:5;41:4; 44:2,23;45:5,7;56:24; 58:23;60:18;70:17; 77:23;78:1;79:6,22; 80:17;89:25;93:6;98:5; 101:16;109:9,12; 115:5,22;118:20; 119:16,18;120:18; 125:9 type (3) 7:22;29:20;119:12 types (3) 12:21;60:1;103:18 typically (1) 98:2	United (2) 4:8;101:20 Unlimited (4) 14:22,25;15:3,20 up (34) 6:23;10:16,17;13:10; 14:9;16:2;22:24;23:12; 19:24;22:26;8;27:7; 31:25;35:13;44:19; 50:24;55:2,3;99:8,9,14, 14,15,17,17;105:21; 108:12,18;109:20; 110:5;112:4;115:21; 118:17;123:14 UPC (3) 33:1,1,8 updated (1) 78:12 upfront (1) 103:10 upset (1) 32:16 upstairs (1) 23:11 USA (1) 4:7 use (9) 5:15,20;111:13; 117:4,7,9;131:23; 133:11,13 used (7) 35:6;69:19;75:2,5; 128:6;130:10,15 usually (2) 27:12;53:9 UW (4) 28:15,21;41:1,18	22:20;23:4,7,13; 24:7;28:15,15;40:25; 41:1,5,7;47:15,17; 98:10;100:9,9 veterinarian (5) 23:1;28:4;38:22,23; 47:23 veterinarians (6) 28:7;40:23;41:18; 57:10,13;96:11 veterinary (2) 17:10,16 vets (2) 28:21;41:3 VIDEOGRAPHER (11) 4:1,12;39:11,14; 65:9,12;95:20,23; 118:10,13;134:1 views (1) 93:11 visit (1) 43:22 visited (7) 35:24;36:3,6;38:11, 23;41:3;43:20 visiting (1) 36:7 visits (1) 11:3 volunteer (1) 11:6 VP (4) 13:10,23;14:24;15:4	42:17,17,19;89:19; 22:90:4;103:21,22; 104:7,9,11,13,13,25; 118:16;119:7,13 waters (1) 84:3 way (9) 13:10;37:14;75:23; 81:2;82:1;88:19;92:16; 122:9,11 weak (1) 99:17 wean (1) 45:18 Weaver (31) 4:6,25;5:1,6,9;6:7; 7:24;9:1;10:16;11:8; 16:4,22;23:17;24:12; 39:16;44:11;63:18; 66:18;67:23;68:19; 69:4;70:5;71:1;72:10; 95:25;110:6;118:15; 120:5;121:20;123:18; 132:8 website (7) 36:1,5,8,15;37:4; 38:23;43:20 websites (7) 19:22;20:4;35:24; 36:22;37:22;38:12; 39:1 week (4) 35:9,9;46:17;48:15 weeks (9) 22:13;33:13;40:3; 46:22;49:2,3,4,5; 116:16 weight (2) 47:9;122:17 weighted (2) 122:9,11 wells (2) 104:4,5 West (1) 70:20 What's (16) 8:25;30:7;42:24; 51:11,16;52:4;60:21; 64:20;77:23;79:18; 82:4;90:13;91:25; 105:16;114:10;117:6 where's (1) 79:16 white (3) 37:6,7,9 Whoa (1) 89:5 whole (10) 9:19;10:18;51:8; 58:24;76:21;77:2; 86:21;88:23;103:10; 122:1 wholesaler (1)
	U	V	W	
uh-huhs (1) 7:3 uncertain (1) 123:21 unclear (1) 69:3 unconditional (1) 26:18 under (3) 5:3;101:18;133:11 underneath (7) 60:18;74:21;76:24; 81:5;82:21;84:1;85:5 Understood (15) 10:1;14:18;16:10; 20:1;21:3;24:6;26:20; 30:22;35:1;37:3,8; 38:7;48:20;64:24; 99:12 unfair (1) 37:18 Union (1) 91:18	vac (2) 102:10,25 vacation (1) 115:17 vacuum (8) 31:12,24;102:2,16, 18;115:25;120:19,20 vague (1) 112:24 value (5) 30:10;59:5;94:2; 125:17;126:3 variety (2) 16:24,25 vast (1) 84:2 vegetables (2) 128:14,15 Verbatim (1) 4:12 versus (3) 4:7;57:24;122:1 vet (16)	wacky (1) 23:16 wait (1) 89:5 waiting (2) 110:8,20 walk (5) 27:1,4,5,5,6 walked (1) 50:16 wall (1) 16:1 Walmart (1) 34:24 wants (1) 90:5 warehouse (2) 13:9;14:3 washed (1) 95:14 washer (1) 61:5 washes (1) 61:1 watching (1) 118:25 water (17)		

14:13 Whose (1) 94:2 wife (25) 9:16;11:4;19:9; 20:12;21:8;24:22;25:1; 17:26;5;31:4,20;32:14; 33:16;35:19;38:7,25; 54:17;55:10;60:10; 61:1;90:5;108:9; 114:20,21;116:23 wife's (3) 21:4;34:10;69:18 wild-caught (1) 87:5 windows (1) 115:24 winter (1) 123:18 Wisconsin (13) 4:6,9,13;5:11;10:21; 11:12;14:17,20;40:22; 66:22;83:7,10,11 Within (5) 22:12;68:2;83:1; 101:23;107:4 witness (16) 4:16;5:2;23:23; 37:17;39:6,9;40:16; 65:7;78:11;79:23; 96:20;106:7,14; 120:14,18;132:12 wonderful (1) 24:18 word (10) 14:11;30:6;44:16; 71:16;72:24;73:18; 76:7;81:15;101:12; 133:12 words (2) 77:7;131:9 work (9) 11:6;14:18;16:22; 97:13,14,20;98:2,4; 109:7 Worked (1) 13:9 works (2) 37:15;41:12 worth (3) 13:11;33:13;52:11 Wow (4) 10:9;15:15;51:18; 62:23 write (2) 7:2;80:1 writing (1) 16:1 wrong (4) 67:2;68:6;113:3,4 wrought (1) 26:25 WWTC (1)	11:20 Y yard (2) 26:25;27:1 year (23) 22:11;32:8;35:3,3; 39:20;40:5;45:10,18, 20;46:2,3,4;48:1,5,8; 51:25;78:20;105:24; 106:3,4;116:13,15,15 years (25) 8:22;10:24;14:5; 15:16,25;16:1;25:12, 18;31:23;39:18;40:5; 52:4;77:20;78:7,8; 96:25;102:12,15,17; 111:24;115:6;118:20, 21;119:16,18 yep (9) 44:19;72:12;75:19; 77:1;87:1;99:23; 100:19;120:11;130:8 yeses (1) 7:4 yesterday (2) 36:9;43:24 York (1) 10:20 young (3) 25:6;55:6;115:14 younger (1) 39:20 1 1 (2) 6:4,5 1,2- (1) 51:24 1:00 (1) 96:4 1:30 (1) 22:20 1:45 (1) 96:3 10 (5) 22:6,6;66:14,24; 118:9 10:12 (1) 95:21 10:22 (1) 95:24 10:48 (1) 118:11 102 (1) 4:5 108 (2) 48:22;51:23 11 (5) 22:6;39:18,18;76:4; 77:22	11:01 (1) 118:14 11:19 (2) 134:2,3 112 (2) 15:13,14 12 (4) 33:6;49:3,4;51:23 12th (1) 33:11 13 (2) 67:20;77:22 13-pound (1) 76:3 15 (3) 8:15;115:8;116:6 17 (2) 115:6;116:4 18 (1) 67:9 18CV1996JPS (1) 4:10 19 (1) 115:6 19th (2) 4:3;124:8 2 2 (4) 4:5;44:8,9;67:10 2,600 (1) 21:7 20 (6) 10:24;13:25;22:21; 52:4;66:15,24 200 (1) 52:2 2007 (6) 39:22;45:13,16; 66:20;67:5,15 2008 (6) 39:21,23;45:22;48:3, 3,4 2010 (1) 39:25 2017 (3) 66:21;67:6,16 2018 (14) 22:14,14;46:6,9; 53:23;67:6,19;69:1; 106:4,6,15,16;124:2,8 2019 (1) 4:3 22 (1) 115:10 24th (1) 96:4 2764 (1) 5:11 3 3 (2) 65:15,16 30 (3) 21:5;23:14;111:24 300 (1) 52:2 30th (1) 96:3 3-31-57 (1) 9:3 35-year-old (1) 10:12 36 (3) 49:3,4,5 38-year-old (1) 10:11 4 4 (11) 67:13;71:24;72:5; 80:24;107:9;125:5,16; 130:21;132:10,11,12 4:00 (1) 49:11 40 (2) 23:15;96:25 42 (2) 56:5,5 43 (1) 8:22 44 (2) 8:22;10:9 5 5 (13) 67:11;75:10,11; 82:23;125:5,17; 127:22,22;132:8,9,9, 11,12 50 (1) 89:25 50/50 (1) 35:6 5-10-57 (1) 5:23 53711 (1) 5:11 6 6 (7) 44:14,16;79:10,11, 17;80:1;107:10 60 (1) 55:23 68 (1) 56:1 7 7 (2)	100:21,22 7:00 (1) 49:11 75 (1) 65:21 8 8 (4) 39:22;119:23,24; 122:4 8,000 (2) 16:16,17 8:00 (1) 4:3 8:38 (1) 39:12 8:47 (1) 39:15 8:52 (1) 110:17 8:58 (1) 110:18 80 (1) 98:9 84 (1) 48:24 9 9:22 (1) 65:10 9:29 (1) 65:13 99 (1) 118:5
--	---	--	---